

EXHIBIT B

JOINT DISPUTED TRIAL EXHIBIT LIST

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1		Yaron Fidler LinkedIn Profile			Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					H.	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
2	3/29/2018	Email chain between Mary Ku and Ami Vora "Re: Chat with Yaron"	FB-SINGER-00118936	FB-SINGER-00118937	Yaron Fidler Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
3	9/6/2017	Email chain "RE: FLAG: Reuters question re Pivotal Research note"	FB-SINGER-00015547	FB-SINGER-00015556	Yaron Fidler Amy Dunn David Amsalleem Alex Schultz Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
4	9/8/2017	Email chain "RE: Reach Estimator data"	FB-SINGER-00116519	FB-SINGER-00116522	Yaron Fidler Rob Goldman Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
5	9/8/2017	Email chain "RE: FLAG Reuters question re Pivotal Research note"	FB-SINGER-00152105	FB-SINGER-00152120	Yaron Fidler Alex Schultz Rob Goldman Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
6	9/12/2017	Email chain re "Germany and Facebook's ad reach estimates"	FB-SINGER-00099239	FB-SINGER-00099244	Yaron Fidler Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H, F, PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
7	9/13/2017	Email re "Error bars on Audience size estimator"	FB-SINGER-00255380	FB-SINGER-00255383	Yaron Fidler Alex Schultz Rob Goldman Amy Dunn David Amsalleem	Will be used to prove Meta's liability, classwide impact, and damages					PREJ	Balance favors admissibility (see FRE 401, 403).
8	10/2/2017	Chat exchange between Amy Dunn, Yaron Fidler, and David Amsalleem	FB-SINGER-00083939	FB-SINGER-00083940	Yaron Fidler Amy Dunn David Amsalleem	Will be used to prove Meta's liability, classwide impact, and damages					MIL, PREJ	MIL is opposed; Balance favors admissibility (see FRE 401, 403).
9	9/28/2017	Video Advertising Bureau presentation titled "Facebook's Reach (on Reach): Miscalculations In The Age Of Precision"	FB-SINGER-00087741	FB-SINGER-00087769	Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).

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10	10/4/2017	Chat exchange between Yaron Fidler and Mary Ku	FB-SINGER-00223808	FB-SINGER-00223809	Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					F, H, MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
11	3/20/2018	Post by Yaron Fidler titled "Sprint 4 Summary, Sprint 5 Kick off"	FB-SINGER-00143914	FB-SINGER-00143916	Yaron Fidler Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					F, H, REL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). The exhibit is relevant (see FRE 401, 402).
12	3/22/2018	Chat exchange with Facebook employees re SUMA	FB-SINGER-00219884	FB-SINGER-00219885	Yaron Fidler David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
13	4/18/2018	Email chain attaching presentation and meeting invitation re "RE: ALT Review: Reach Estimates Plan; Presentation titled "Audience Size and People Narrative"	FB-SINGER-00100507	FB-SINGER-00100508	Yaron Fidler Amy Dunn Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, H, REL, MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
14	4/18/2018	Email chain "Re: ALT Review: Reach Estimates Plan"	FB-SINGER-00041734	FB-SINGER-00041735	Yaron Fidler Amy Dunn David Amsallem Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H, PREJ, MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403).
15	4/23/2018	Email chain and meeting invitation re "RE: ALT Review: Reach Estimates Plan"	FB-SINGER-00095331	FB-SINGER-00095332	Yaron Fidler Amy Dunn David Amsallem Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					PREJ	Balance favors admissibility (see FRE 401, 403).
16	5/4/2018	Email re "Reach Estimation Monitoring"	FB-SINGER-00218939	FB-SINGER-00218945	Yaron Fidler David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					PREJ; MIL	MIL is opposed; Balance favors admissibility (see FRE 401, 403).
17	5/30/2018	Email re "[tasks] T27367509: Provide the post SUMA and age model numbers for the overestimation email	FB-SINGER-00277152	FB-SINGER-00277154	Yaron Fidler David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					H, PREJ, MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403).
18	5/15/2018	Facebook document titled "SUMA model validation for ads usage"	FB-SINGER-00275867	FB-SINGER-00275879	Yaron Fidler Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					MIL, PREJ	MIL is opposed; Balance favors admissibility (see FRE 401, 403).
19	11/5/2018	Edit log and comment chain for Internal Facebook document	FB-SINGER-00151896	FB-SINGER-00151907	Yaron Fidler David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					MIL, H, PREJ, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
20	2/1/2019	Document titled "SUMA model validation for ads usage"	FB-SINGER-00060563	FB-SINGER-00060568	Yaron Fidler Amy Dunn David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					MIL, PREJ	MIL is opposed; Balance favors admissibility (see FRE 401, 403).

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21	5/16/2018	Chat exchange between Yaron Fidler and Nicole LeClair	FB-SINGER-00040047		Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					H, PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403).
22	6/11/2018	Email and comment chain among Facebook employees "Re [Reach estimate working group] Cocoon SUMA Integration Launch"	FB-SINGER-00092435	FB-SINGER-00092437	Yaron Fidler Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H, PREJ, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
23	6/11/2018	Comment chain "Re: [Reach estimate working group] Cocoon SUMA Integration Launch"	FB-SINGER-00079642	FB-SINGER-00079644	Yaron Fidler Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H, PREJ, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
24	6/12/2018	Email chain "RE: Decision required - SUMA integration into delivery"	FB-SINGER-00093089	FB-SINGER-00093097	Yaron Fidler Sheryl Sandberg	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
25	6/14/2018	Email chain "RE: Decision required - SUMA integration into delivery"	FB-SINGER-00065810	FB-SINGER-00065816	Yaron Fidler Rob Goldman Rahul Bhandari David Amsellem Amy Dunn Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					MIL, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
26	6/22/2018	Email chain "RE: Decision required - SUMA integration into delivery"	FB-SINGER-00255308	FB-SINGER-00255314	Yaron Fidler Alex Schultz Rob Goldman Alex Schultz David Amsellem Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					MIL, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
27	7/12/2018	Chat exchange between Yaron Fidler and Jeremy Galen	FB-SINGER-00041107		Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, H, MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403).
28	8/3/2018	Email chain "RE: Clarification of People metrics in interfaces and marketing"	FB-SINGER-00093102	FB-SINGER-00093108	Yaron Fidler Amy Dunn Rob Goldman David Amsellem	Will be used to prove Meta's liability, classwide impact, and damages					H, MIL, PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403).
29	8/24/2018	Alert - Country Overestimation Detector	FB-SINGER-00041014		Yaron Fidler David Amsellem	Will be used to prove Meta's liability, classwide impact, and damages					MIL, PREJ, REL	MIL is opposed; Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
30	8/24/2018	Comment chain re Reach estimate working group	FB-SINGER-00198219	FB-SINGER-00198220	Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					H, REL, PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
31	10/10/2018	Chat exchange between Ori Hanegby and Yaron Fidler	FB-SINGER-00116577	FB-SINGER-00116579	Yaron Fidler Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403).

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32	10/10/2018	Email chain between Facebook employees "Re: Targeting Reach Estimates [DP Pillar Review]"	FB-SINGER-00117090	FB-SINGER-00117094	Yaron Fidler Larry Chiagouris Rahul Bhandari Chinmay Karande	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
33	10/25/2018	Email chain between Alex Lobert, Isabelle Cochi, and Yaron Fidler "FW: Reach estimates meeting wrap-up"	FB-SINGER-00125075	FB-SINGER-00125078	Yaron Fidler Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Charles Cowan	Expert Cross-Examination			REL; PREJ; MIL	MIL is opposed; Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
34	4/23/2018	Email chain re "ALT Review: Reach Estimates Plan"	FB-SINGER-00164997	FB-SINGER-00164999	Yaron Fidler Charles Cowan Amy Dunn David Amsallem Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403).
35	Unknown	Amy Dunn LinkedIn Profile			Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
36	6/24/2019	Facebook Inc.'s First Amended Responses and Objections to Plaintiffs' First Set of Requests for Interrogatories			Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					LC	Exhibit is not inadmissible based on the presence of legal conclusions, if any.
37	1/1/2018	Facebook Organization Chart	FB-SINGER-00000510		Amy Dunn Javier Olivan Sheryl Sandberg	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
38	7/17/2017	Email chain "Re: [Need Response ASAP] Refund Requests & Potential Reach vs Census"	FB-SINGER-00227490	FB-SINGER-00227491	Amy Dunn Alex Schultz Rob Goldman Javier Olivan Sheryl Sandberg	Will be used to prove Meta's liability, classwide impact, and damages					REL, PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
39	8/9/2017	Chat exchange between Amy Dunn and Jenny Lin	FB-SINGER-00086118		Amy Dunn Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					REL, PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
40	10/11/2017	Comment chain between Ads Constructive Feedback Group	FB-SINGER-00087620	FB-SINGER-00087621	Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					PREJ	Balance favors admissibility (see FRE 401, 403).
41	9/6/2017	Memo and comments re "Reactive Messaging for Press Around Facebook's Potential Reach Versus Census Estimates"	FB-SINGER-00087726	FB-SINGER-00087740	Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					MIL, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
42	11/2/2017	Email re "[Location infra Q&A] Hi all - two questions - "	FB-SINGER-00079372	FB-SINGER-00079373	Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
43	11/14/2017	Comment chain re "Frontend UI Showing Smaller, Rounded-up Audience Size for Partner Category"	FB-SINGER-00039935	FB-SINGER-00039940	Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					PREJ	Balance favors admissibility (see FRE 401, 403).
44	11/8/2017	Email chain re "MLHP in production - metrics change"	FB-SINGER-00091906	FB-SINGER-00091909	Amy Dunn David Amsallem Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, REL	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
45	4/19/2018	Facebook document titled "Audience Size ALT Notes - 4/19/18"	FB-SINGER-00144801	FB-SINGER-00144805	Amy Dunn Yaron Fidler Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).

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46	4/27/2018	Email from Amy Dunn to Amy Lee "Potential Reach Presentation" and Presentation titled "Potential Reach Relaunch"	FB-SINGER-00080022	FB-SINGER-00080023	Amy Dunn Alex Schultz Charles Cowan Steven Tadelis Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					REL, PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
47	2/12/2018	Comment from Amy Dunn to Yaron Fidler in Reach estimate working group	FB-SINGER-00224906		Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					PREJ	Balance favors admissibility (see FRE 401, 403).
48	10/31/2017	Email chain re "[ESCALATION] Changing messaging for tomorrow's announcement to exclude specific references to age modeling"	FB-SINGER-00217686	FB-SINGER-00217687	Amy Dunn Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					PREJ	Balance favors admissibility (see FRE 401, 403).
49	7/11/2018	Email chain "Re: [RESPONSE REQUESTED] Advertisers questions on people numbers and measurement"	FB-SINGER-00079720	FB-SINGER-00079727	Alex Schultz Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403).
50	10/1/2018	Email re "Potential Reach"	FB-SINGER-00256233		Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					REL, MIL	MIL is opposed. The exhibit is relevant (see FRE 401, 402).
51	9/8/2017	Facebook Document titled "Pre-Reading Audience Estimator / Potential Reach Update & Comms September 8th"	FB-SINGER-00188089		Amy Dunn Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, MIL	MIL is opposed; Balance favors admissibility (see FRE 401, 403).
52	12/19/2017	Email chain between Amy Dunn and Mary Ku "Re: Reach Estimation"	FB-SINGER-00119235	FB-SINGER-00119236	Amy Dunn Greg Allenby David Reibstein Steven Tadelis Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ; MIL	MIL is opposed; Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
53	Unknown	David Amsallem LinkedIn Profile			David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages	David Amsallem	Explain Meta's Estimates, Metrics, and Models	Hearsay; Improper Character Evidence; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Not improper character evidence (see FRE 607, 608). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
54	9/27/2017	Facebook document titled "Proposal for Targeting Data Quality Monitoring System"	FB-SINGER-00178072	FB-SINGER-00178078	David Amsallem Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
55	10/9/2017	Chat exchange re city populations	FB-SINGER-00002989	FB-SINGER-00002990	David Amsallem Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
56	11/7/2017	Facebook document titled "Impact of Age Modeling and SUMA on overestimation"	FB-SINGER-00305753	FB-SINGER-00305763	David Amsallem Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					MIL, REL	MIL is opposed. The exhibit is relevant (see FRE 401, 402).
57	11/8/2017	Email and post by David Amsallem titled "Impact of Age and SUMA Modeling on Overestimation"	FB-SINGER-00270499	FB-SINGER-00270500	David Amsallem Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					MIL	MIL is opposed.
58	11/20/2017	Chat exchange	FB-SINGER-00263160	FB-SINGER-00263162	David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, REL	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).

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59.1	11/20/2017	Chat exchange between Yaron Fidler and David Amsallem	FB-SINGER-00220707	FB-SINGER-00220708	David Amsallem Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					MIL, PREJ	MIL is opposed; Balance favors admissibility (see FRE 401, 403).
59.2	11/20/2017	Facebook document titled "Global Analysis" and showing an equation for overestimation	FB-SINGER-00220710		David Amsallem Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					MIL, PREJ	MIL is opposed; Balance favors admissibility (see FRE 401, 403).
60	2/8/2018	Post by David Amsallem in "Reach Estimate Working Group"	FB-SINGER-00256093		David Amsallem Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					REL, MIL	MIL is opposed. The exhibit is relevant (see FRE 401, 402).
61	2/20/2018	Chat exchange between David Amsallem and Tony Zhang	FB-SINGER-00262673		David Amsallem Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					MIL	MIL is opposed.
62	8/3/2018	Chart showing Population Overestimation (Country-Level) for January 2018 through August 2018	FB-SINGER-00263680		David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					H, MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
63	4/12/2018	Email re "New dashboard captures impact of Age and SUMA Modeling on Audience Sizes"	FB-SINGER-00264095	FB-SINGER-00264096	David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					MIL	MIL is opposed.
64	10/22/2018	Chat exchange between David Amsallem and Yiyang Shi	FB-SINGER-00262925	FB-SINGER-00262927	David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					MIL, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
65	4/12/2018	Comment thread re "New dashboard captures impact of Age and SUMA Modeling on Audience Sizes"	FB-SINGER-00270922	FB-SINGER-00270923	David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					MIL	MIL is opposed.
66	4/2/2018	Comment on Reach estimate working group re audience sizes	FB-SINGER-00198241		David Amsallem Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					MIL	MIL is opposed.
67	4/3/2018	Comment sharing table (FB-SINGER-00223757) and Table titled "Audience Sizes by Age Group & Gender Worldwide"	FB-SINGER-00223756	FB-SINGER-00223757	David Amsallem Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					MIL	MIL is opposed.
68	4/16/2018	Comment chain re "Impact Analysis Request"	FB-SINGER-00084233	FB-SINGER-00084234	David Amsallem Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					MIL, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
69	4/16/2018	Document - "Delivery Products Data Science Update"	FB-SINGER-00227377	FB-SINGER-00227382	David Amsallem Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					MIL	MIL is opposed.
70	3/19/2018	post re "Evaluating the accuracy of SUMA-aware audience sizes returned by Cocoon"	FB-SINGER-00082678	FB-SINGER-00082679	David Amsallem Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					MIL, REL	MIL is opposed. The exhibit is relevant (see FRE 401, 402).
71	6/15/2018	Comment chain between Amy Dunn, Yaron Fidler, Richard Qiu, Ping Chen, and David Amsallem re "Cocoon SUMA Integration Launch"	FB-SINGER-00078510	FB-SINGER-00078512	David Amsallem Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, REL, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).

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72	12/12/2018	Chat exchange between Rahul Bhandari, David Amsallem, and Alex Lobert, which includes screenshot found at FB-SINGER-00169909 and Screenshot of text beginning with "Next steps", included in chat exchange at FB-SINGER-00169905	FB-SINGER-00169905	FB-SINGER-00169910	David Amsallem Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages	David Amsallem	Explain Meta's Estimates, Metrics and Models			REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
73	2/1/2019	Document titled "SUMA Model Evaluation for Ads - Model accuracy and impact on overestimation"	FB-SINGER-00025711	FB-SINGER-00025715	Alex Schultz David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					MIL, REL, PREJ	MIL is opposed; Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
74	9/25/2017	Chat exchange between David Amsallem and Don van der Drift	FB-SINGER-00262130	FB-SINGER-00262131	David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, REL	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
75	1/16/2018	Email and comments "Re: [tasks] T25218615: Investigate discrepancy between Cocoon and dim_all_users audience sizes"	FB-SINGER-00258878	FB-SINGER-00258881	Charles Cowan David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					H, MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
76	9/30/2016	Email from Alex Schultz and Javier Olivan re "come up with the list of flake metrics across the whole company"	FB-SINGER-00278971	FB-SINGER-00278972	Alex Schultz Javier Olivan	Will be used to prove Meta's liability, classwide impact, and damages					REL, PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
77	9/6/2017	Email chain re "FLAG: Reuters question re Pivotal Research note"	FB-SINGER-00006597	FB-SINGER-00006604	Rob Goldman Alex Schultz Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					H, MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
78	9/6/2017	Chat exchange between Amy Dunn and Joseph Benarroch	FB-SINGER-00146870	FB-SINGER-00146872	Rob Goldman Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
79	9/7/2017	Email chain re "sheryl feedback on age audience size issues"	FB-SINGER-00255387	FB-SINGER-00255389	Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H, MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.
80	9/8/2017	Email chain re "Reach Estimator data"	FB-SINGER-00119421	FB-SINGER-00119422	Rob Goldman Yaron Fidler Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					F, H	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
81	9/8/2017	Email from Mary Ku to Amy Dunn re "Notes from Ads XFN meeting"	FB-SINGER-00275238		Rob Goldman Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
82	9/8/2017	Facebook document titled "Ads XFN - Reach Estimation"	FB-SINGER-00145935	FB-SINGER-00145938	Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
83	9/12/2017	Email chain re "FLAG: Reuters question re Pivotal Research note"	FB-SINGER-00165774	FB-SINGER-00165787	Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
84	9/11/2017	Email chain re "Reach estimator" attaching presentation and Presentation titled "Targeting Quality"	FB-SINGER-00093233	FB-SINGER-00093235	Rob Goldman David Amsallem Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
85	9/12/2017	Email chain re "Reach estimate statement"	FB-SINGER-00081777	FB-SINGER-00081780	Rob Goldman Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H, PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403).
86	7/1/2018	Facebook Organization Chart	FB-SINGER-00000515		Rob Goldman Javier Olivan Sheryl Sandberg Alex Schultz Yaron Fidler Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
87	9/12/2017	Facebook document titled "Delivery Review Notes 9/12"	FB-SINGER-00226224	FB-SINGER-00226230	Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
88	9/14/2017	Email chain re "Error bars on audience size estimator"	FB-SINGER-00184597	FB-SINGER-00184602	Rob Goldman Yaron Fidler Chinmay Karande Alex Schultz Amy Dunn David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
89	9/20/2017	Email chain re "Recommendations for potential reach messaging (in product and help center)" and image attached to email chain	FB-SINGER-00181941	FB-SINGER-00181948	Yaron Fidler Rob Goldman Amy Dunn Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
90	10/3/2017	Email re "RE: Age and country level - SUMA"	FB-SINGER-00274929		Alex Schultz Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
91	10/26/2017	Email chain re "Client and Measurement Council calls Re: [Please Review] Sheryl Review: Metric Comms"	FB-SINGER-00083058	FB-SINGER-00083064	Rob Goldman Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
92	10/26/2017	Meeting invite re "Communicating our metrics"	FB-SINGER-00165792		Rob Goldman Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
93	11/27/2017	Email chain re "People v. accounts", attaching presentation and Presentation titled "Accounts v. people framing"	FB-SINGER-00255607	FB-SINGER-00255612	Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
94	6/27/2018	Email chain "RE: Decision required - SUMA integration into delivery"	FB-SINGER-00060541	FB-SINGER-00060550	Rob Goldman Alex Schultz David Amsallem Yaron Fidler Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis; Amy Dunn; Yaron Fidler; David Amsallem; Rob Goldman; Alex Schultz	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402).
95	7/10/2018	Chat exchange	FB-SINGER-00005995	FB-SINGER-00005996	Rob Goldman Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					F, REL, PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
96	7/11/2018	Email from Yaron Fidler to Rob Goldman re "SUMA decision"	FB-SINGER-00218208		Rob Goldman Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					REL, PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
97	8/3/2018	Email from Facebook employee Ty Ahmad-Taylor to Rob Goldman, Mark Rabkin, and Javier Olivan with subject "People v People" v Accounts" and attaching presentation and Presentation produced by Facebook titled "SUMA Effort"	FB-SINGER-00278838	FB-SINGER-00278840	Rob Goldman Javier Olivan Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
97.2	7/6/2018				Rob Goldman Javier Olivan Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					F, REL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
98	5/16/2017	Vox article titled "Mark Zuckerberg's birthday photo shows the 20 Facebookers you should know not named Mark Zuckerberg"			Rob Goldman Javier Olivan Sheryl Sandberg	Will be used to prove Meta's liability, classwide impact, and damages					H, REL, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
99	5/16/2017	Email re "CGC SUMA presentation follow up", attaching presentation and Presentation titled SUMA CGC Presentation	FB-SINGER-00314065	FB-SINGER-00314067	Alex Schultz Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
100	6/12/2017	Email re "Family MAP and DAP reporting update", attaching presentation	FB-SINGER-00301080	FB-SINGER-00301081	Alex Schultz Javier Olivan	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Good Faith; Relevant to Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402).
100	6/12/2017	Presentation titled "Family of Apps"			Alex Schultz Javier Olivan	Will be used to prove Meta's liability, classwide impact, and damages					F, REL, PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
101	9/6/2017	Email chain "RE: FB Video Initiatives, Measurement Issues Good for NLSN, SCOR"	FB-SINGER-00173288	FB-SINGER-00173292	Alex Schultz Sheryl Sandberg Javier Olivan	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
102	9/6/2017	Email re "FLAG - Reach Estimation Tool Press Cycle"	FB-SINGER-00284873	FB-SINGER-00284874	Alex Schultz Sheryl Sandberg	Will be used to prove Meta's liability, classwide impact, and damages					H, F, MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). MIL is opposed.
103	9/6/2017	Email chain re "Reuters question re Pivotal Research note"	FB-SINGER-00152274	FB-SINGER-00152283	Alex Schultz Yaron Fidler Amy Dunn David Amsellem Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					F, H, MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
104	9/15/2017	Email chain re "Error bars on audience size estimator"	FB-SINGER-00188813	FB-SINGER-00188821	Alex Schultz Yaron Fidler Chinmay Karande Amy Dunn Javier Olivan David Amsalleem	Will be used to prove Meta's liability, classwide impact, and damages					REL, PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
105	10/16/2017	Email re "Product Group: Core Growth + Special Countries", attaching presentation	FB-SINGER-00128575		Javier Olivan Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
105	10/16/2017	Presentation titled "SUMA CGC Update"	FB-SINGER-00128576		Alex Schultz Javier Olivan	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
106	11/16/2017	Email from Steve DeLucia to Alex Schultz re "1:1 Steve D & Alex Bi-weekly news series 2017", attaching presentation	FB-SINGER-00314133		Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					PREJ	Balance favors admissibility (see FRE 401, 403).
106	11/16/2017	Presentation titled "Accounts v. People framing, Nov 2017"	FB-SINGER-00314134		Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					REL, MIL	MIL is opposed. The exhibit is relevant (see FRE 401, 402).
107	4/13/2018	Email chain re "Agenda (+Pre-Read) for central external metrics XFN"	FB-SINGER-00165772	FB-SINGER-00165773	Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					F, H, PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403).
108	4/13/2018	Email chain between Facebook employees Alex Schultz, Michael Levinson, and Jon Hoover "RE: feedback / next steps on today's reviews"	FB-SINGER-00118422	FB-SINGER-00118423	Yaron Fidler Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					F, PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
109	4/14/2018	Email chain re "this shouldn't say unique people"	FB-SINGER-00308067	FB-SINGER-00308068	Alex Schultz Javier Olivan Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					F, REL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
110	4/16/2018	Email chain between Facebook employees "Re: Error Bars: Tracking Uncertainty at FB"	FB-SINGER-00314216	FB-SINGER-00314217	Alex Schultz David Amsalleem	Will be used to prove Meta's liability, classwide impact, and damages					F, REL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
111	4/23/2018	Chat exchange between Alex Schultz & Jon Hoover	FB-SINGER-00274359	FB-SINGER-00274360	Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
112	4/20/2018	Chat exchange between Alex Schultz & Rob Goldman	FB-SINGER-00272397		Alex Schultz Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
113	6/4/2018	Chat exchange between Yaron Fidler & Amy Dunn	FB-SINGER-00224709	FB-SINGER-00224710	Alex Schultz Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
114	5/16/2017	Email chain re "MAP fake accounts breakdown and DEC"	FB-SINGER-00308587	FB-SINGER-00308593	Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
115	8/5/2018	Email chain re "people v people" v Accounts"	FB-SINGER-00279590	FB-SINGER-00279591	Alex Schultz Javier Olivan	Will be used to prove Meta's liability, classwide impact, and damages					F, PREJ, MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). MIL is opposed.
116	1/23/2019	Email chain and meeting invite "RE: MTG: Data transparency new 2019 series"	FB-SINGER-00314457	FB-SINGER-00314463	Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					PREJ, REL, MIL	MIL is opposed; Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
117	3/7/2019	Email chain re "FB deactivation and usage stats"	FB-SINGER-00313657	FB-SINGER-00313661	Alex Schultz Javier Olivan	Will be used to prove Meta's liability, classwide impact, and damages					REL, PREJ, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
118	3/29/2019	Email chain re "Negative FT story on the FB Growth team due Weds night MPK time"	FB-SINGER-00307674	FB-SINGER-00307683	Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					H, REL, PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
119	6/22/2015	Youtube link to a 2015 talk by Alex Schultz on "Growth"			Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages					D	Document is a prior deposition exhibit.
121	8/20/2020	Facebook Inc.'s Amended and Supplemental Responses and Objections to Plaintiffs' Third Set of Requests for Interrogatories			Chinmay Karande	Will be used to prove Meta's liability, classwide impact, and damages					LC	Exhibit is not inadmissible based on the presence of legal conclusions, if any.
122	11/19/2019	Wiki page titled adfinder auction	FB-SINGER-00186795	FB-SINGER-00186801	Chinmay Karande Timothy Roughgarden Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
123	11/4/2019	Facebook Business page titled "How Much do Facebook Ads Cost?" Non-Bates numbered web page attached to end	FB-SINGER-00089017	FB-SINGER-00089027	Chinmay Karande Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Steven Tadelis	Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
124	1/7/2020	Facebook document titled "Auction, Delivery, and Ad Buying"	FB-SINGER-00187518	FB-SINGER-00187522	Chinmay Karande Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Steven Tadelis	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction; Relevant to Good Faith			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
125	8/24/2020	Facebook Business Help Center page titled "How much it costs to advertise on Facebook"			Chinmay Karande	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
126	1/15/2019	Facebook Business Help Center page titled "CPM (Cost per 1,000 Impressions) "			Chinmay Karande Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
127	12/9/2019	Ads Help Center - "About your CPM under reach and Frequency" Additional, non-Bates numbered web page attached after	FB-SINGER-00089483	FB-SINGER-00089484	Chinmay Karande	Will be used to prove Meta's liability, classwide impact, and damages	Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
128	11/19/2019	Internal Facebook wiki page titled "Budgets and pacing"	FB-SINGER-00186887	FB-SINGER-00186891	Timothy Roughgarden Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
129	1/21/2020	Article titled "Bid Price Discounts and Auction Density: Follow-ups"	FB-SINGER-00187566	FB-SINGER-00187578	Timothy Roughgarden Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
130	8/5/2016	CNBC article titled "Digital media is worried readers are burning out on too many ads"			Chinmay Karande	Will be used to prove Meta's liability, classwide impact, and damages					H, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). The exhibit is relevant (see FRE 401, 402).
131	11/19/2019	Wiki page "Feed ads auction"	FB-SINGER-00186952	FB-SINGER-00186960	Timothy Roughgarden Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Steven Tadelis	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction; Relevant to Good Faith	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	F; PREJ; MIL; REL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). MIL is opposed. The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
132	11/19/2019	Internal Wiki page titled "Conversion Optimization"	FB-SINGER-00186896	FB-SINGER-00186913	Chinmay Karande Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages	Chinmay Karande	relevant to estimates, metrics, models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	REL	The exhibit is relevant (see FRE 401, 402).
134	10/12/2020	Facebook Inc.'s Third Amended and Supplemental Responses and Objections to Plaintiffs' Second Set of Requests for Interrogatories			Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages					LC	Exhibit is not inadmissible based on the presence of legal conclusions, if any.
135		Facebook Inc.'s Verification of Responses to Plaintiffs' Interrogatory No. 3			Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages					LC	Exhibit is not inadmissible based on the presence of legal conclusions, if any.
136	7/15/2019	Document titled "About Potential Reach"	FB-SINGER-00095154	FB-SINGER-00095154	Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages	Rahul Bhandari; Steve Tadelis	Expert Foundation; Relevant to Good Faith; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
137	6/15/2020	Internal Wiki page titled "Potential Reach Data Sources"	FB-SINGER-00424717	FB-SINGER-00424725	Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages	Rahul Bhandari Steven Tadelis	Explain Meta's Estimates, Metrics, and Models Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
138	3/19/2020	Document produced by Facebook titled "Potential Reach Data Sources"	FB-SINGER-00424780	FB-SINGER-00424796	Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages	Rahul Bhandari	Explain Meta's Estimates, Metrics, and Models			PREJ	Balance favors admissibility (see FRE 401, 403 and Meta's designation).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
139	6/8/2016	Facebook document titled "Unicorn based InvEst versus Cocoon"	FB-SINGER-00183123	FB-SINGER-00183125	Rahul Bhandari Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker, Steven Tadelis Rahul Bhandari	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Relevant to Good Faith Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
140	8/25/2018	Presentation titled "City-Level Home Prediction 8/28"	FB-SINGER-00278872	FB-SINGER-00278892	Javier Olivan Rahul Bhandari Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Alex Schultz; Rob Goldman Rahul Bhandari	Expert Foundation; Relevant to Good Faith; Relevant to Meta's Estimates, Metrics, and Models Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
141	4/13/2016	Facebook document titled "Targeting"	FB-SINGER-00077557	FB-SINGER-00077577	Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages	Rahul Bhandari	Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
143	4/19/2018	Email chain re "Reach estimation and MAP numbers"	FB-SINGER-00084221	FB-SINGER-00084223	Rahul Bhandari Charles Cowan Atif Hashmi Yaron Fidler Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
144	11/26/2018	Facebook document titled "Investigation on Data Discrepancy Between Ads Request vs. Ads Impression"	FB-SINGER-00184892	FB-SINGER-00184894	Charles Cowan David Amsellem	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Yaron Fidler; Steven Tadelis	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Relevant to Good Faith			F, REL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
145	8/20/2020	Excel Data	FB-SINGER-00426292		Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
147	12/14/2018	Email re "Community Integrity Analytics HPM - Dec 14, 2018"	FB-SINGER-00297714	FB-SINGER-00297720	Rahul Bhandari	Will be used to prove Meta's liability, classwide impact, and damages					F, REL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
148	6/25/2020	Wiki page "all_ads_details"	FB-SINGER-00313499	FB-SINGER-00313546	Gerardo Zaragoza Charles Cowan Armando Levy Timothy Roughgarden Steven Tadelis Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Alex Schultz; Steven Tadelis Gerardo Zaragoza	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models Relevant to Good Faith; Relevant to Disclosures, Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
149	9/3/2020	Internal Facebook wiki page titled "BroadCategoryTargeting"	FB-SINGER-00426321	FB-SINGER-00426322	Gerardo Zaragoza Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Relevant to Disclosures, Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
150	9/3/2020	Internal Facebook wiki page titled "GeneralLocationTargeting"	FB-SINGER-00426314	FB-SINGER-00426320	Gerardo Zaragoza Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Relevant to Disclosures, Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	REL, PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
152	5/15/2020	Excel Data - Country Codes (data dictionary)	FB-SINGER-00304046		Gerardo Zaragoza Charles Cowan Steven Tadelis Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					REL, PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
154	5/15/2020	Excel Data - Region Mapping (data dictionary)	FB-SINGER-00304054		Gerardo Zaragoza Charles Cowan Steven Tadelis Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
156	9/8/2020	Data produced by Facebook with filename "Interest Targeting Decoder.csv"	FB-SINGER-00426324		Gerardo Zaragoza Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
157	9/3/2020	Internal Facebook wiki page titled "User Profile Targeting Key Codes"	FB-SINGER-00426302	FB-SINGER-00426313	Gerardo Zaragoza Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	F, REL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
158	6/25/2020	Internal Facebook wiki page titled "Guide to targeting types"	FB-SINGER-00304060	FB-SINGER-00304068	Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Steven Tadelis Gerardo Zaragoza	Expert Foundation; Relevant to Good Faith; Relevant to Disclosures, Explain Meta's Estimates, Metrics, and Models Relevant to Good Faith; Relevant to Disclosures, Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
160	Unknown	2015-10_aad.csv	FB-SINGER-00314652	FB-SINGER-00314652	Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
162	Unknown	Excel Data - Budget & Schedule Data	FB-SINGER-00314707		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
164		ads_reach_estimate_monitoring_results_with_placement_suma_FULL.csv	FB-SINGER-00331431	FB-SINGER-00331431	Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models			REL, F, PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
166	Unknown	ads_reach_estimate_monitor_combined.csv	FB-SINGER-00331432	FB-SINGER-00331432	Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
168		ads_reach_estimate_monitoring_results_day_over_day_changes_beautified_part_1.csv	FB-SINGER-00331433	FB-SINGER-00331433	Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
170		Targeting Data (2018)	FB-SINGER-00426454		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
170		Targeting Data (2018)	FB-SINGER-00426454		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					F, PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
172	1/30/2020	Excel Data - Max Martialis Targeting	FB-SINGER-00180472		Cain Maxwell Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza; Steve Tadleis; Cain Maxwell Gerardo Zaragoza	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance, Relevant to Damages Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models; Relevant to Plaintiffs' Behavior			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
174	1/21/2020	Excel Data	FB-SINGER-00187603		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
176	1/21/2020	Excel Data	FB-SINGER-00187604		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
178	1/21/2020	Excel Data	FB-SINGER-00187605		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
180	1/21/2020	Excel Data	FB-SINGER-00187606		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
182	1/21/2020	Excel Data	FB-SINGER-00187607		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
183	1/21/2020	Excel Data	FB-SINGER-00187608		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					F, PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
184	1/21/2020	Excel Data	FB-SINGER-00187608		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
186	1/21/2020	Excel Data	FB-SINGER-00187609		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
188	1/21/2020	Excel Data	FB-SINGER-00187610		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
190	1/21/2020	Excel Data	FB-SINGER-00187611		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
192	1/21/2020	Excel Data	FB-SINGER-00187612		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
194	1/21/2020	Excel Data	FB-SINGER-00187613		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
196	1/21/2020	Excel Data	FB-SINGER-00187614		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
198	1/21/2020	Excel Data	FB-SINGER-00187615		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
200	1/21/2020	Excel Data	FB-SINGER-00187616		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
202	1/21/2020	Excel Data	FB-SINGER-00187617		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
204	1/21/2020	Excel Data	FB-SINGER-00187618		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
206	1/21/2020	Excel Data	FB-SINGER-00187619		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
208	1/21/2020	Excel Data	FB-SINGER-00187620		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
210	1/21/2020	Excel Data	FB-SINGER-00187621		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
212	8/18/2020	Excel Data	FB-SINGER-00331438		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
214	8/18/2020	Excel Data	FB-SINGER-00331440		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
216	8/20/2020	Excel Data with file name "Interrogatory No. 6_MSA to Anonymized ID.xlsx"	FB-SINGER-00331441		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
218	7/26/2020	Excel Data - List of Ad_IDs with Custom Audiences	FB-SINGER-00314706		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
220		Data produced by Facebook with file name "Impression_lifecycle_pii_export_2020-09-30.csv"	FB-SINGER-00426480		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL, F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
222	8/20/2020	Data file produced by Facebook with filename "table_client_1.csv"	FB-SINGER-00426291		Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
236	4/16/2020	audience_integrity_reach_estimates_inc_archive_post_may_2018.csv	FB-SINGER-00256373	FB-SINGER-00256373	Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Relevant to Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
238	4/27/2020	audience_integrity_reach_estimates_inc_archive_pre_may_2018.csv	FB-SINGER-00256374	FB-SINGER-00256374	Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Relevant to Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
240	4/16/2020	aud_int_alerts_post_may_2018.csv	FB-SINGER-00256375	FB-SINGER-00256375	Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Relevant to Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
242	4/27/2020	aud_int_alerts_pre_may_2018.csv	FB-SINGER-00256376	FB-SINGER-00256376	Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Relevant to Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
251		Table tracking and describing data productions			Gerardo Zaragoza	Will be used to prove Meta's liability, classwide impact, and damages	Gerardo Zaragoza	Relevant to Good Faith; Relevant to Meta's Estimates, Metrics, and Models			REL	The exhibit is relevant (see FRE 401, 402).
252	12/22/2020	Expert Report of Dr. Larry Chiagouris			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
253	12/23/2020	Definition of "Reach" on website Common Language Marketing Dictionary			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages	Larry Chiagouris	Expert Cross-Examination			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Expert reasonably relied on and probative value substantially outweighs any prejudicial effect (FRE 703).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
254		Ads Manager - Performance Chart					Larry Chiagouris	Expert Cross-Examination	Hearsay; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
255	3/11/2021	Business Help Center - "About Potential Reach", Screenshot			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages	Larry Chiagouris	Expert Cross-Examination			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Expert reasonably relied on and probative value substantially outweighs any prejudicial effect (FRE 703).
256	11/27/2017	Email chain between Facebook Employees Yaron Fidler and Steve DeLucia "RE: People VS Accounts"	FB-SINGER-00255609	FB-SINGER-00255611	Rob Goldman Yaron Fidler Sheryl Sandberg Alex Schultz Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
260	11/20/2020	Opinion and Order, <i>Navarro v. Procter & Gamble Company</i> , 17-cv-406 (S.D. Oh.)					Larry Chiagouris	Expert Cross-Examination	Hearsay; Relevancy; Prejudicial, Confusing; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
262	11/7/2007	Opinion <i>Mannion v. Coors Brewing Co.</i> , 04Civ 1187 (S.D.N.Y.)					Larry Chiagouris	Expert Cross-Examination	Hearsay; Relevancy; Prejudicial, Confusing; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
263	12/20/2019	Memorandum Opinion and Order, <i>Toyot Tire & Rubber Co., Ltd. V. Atturo Tire Corp.</i> , 14-cv-00206 (N.D. Ill.)					Larry Chiagouris	Expert Cross-Examination	Hearsay; Relevancy; Prejudicial, Confusing; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
264	3/7/2017	Order Adopting Report and Recommendation, <i>Plasti Intl, Inc. v. Rust-Oleum Co., et al.</i> , No. 14-cv-1831 (D. Minn)					Larry Chiagouris	Expert Cross-Examination	Hearsay; Relevancy; Prejudicial, Confusing; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
265	12/22/2020	Schedule 1 - DZ Reserve Ad Spend					Bruce McFarlane	Expert Cross-Examination	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
267	11/28/2016	Email "Re: [tasks] #14589466: Outcome prediction (reach/engagement) failing"	FB-SINGER-00019177	FB-SINGER-00019178	Armando Levy Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					REL, MIL, H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
269	4/24/2018	Facebook document titled "Reach Estimation - Summary of Research Insights"	FB-SINGER-00150228		Amy Dunn Yaron Fidler Rob Goldman Armando Levy Larry Chiagouris Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
272		Potential Reach - Facebook Business Help Center					Bruce McFarlane	Expert Cross-Examination	Foundation	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
273	12/22/2020	Expert Report of Dr. Atif Hashmi			Adam Porter Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
274		Curriculum Vitae for Dr. Atif Hashmi			Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
275	12/22/2020	Expert Report of Dr. Atif Hashmi, Exhibit B: Additional Materials Relied Upon			Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
276	3/17/2021	Expert Reply Report of Dr. Atif Hashmi			Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
277		Expert Reply Report of Dr. Atif Hashmi, Exhibit A: Additional Materials Relied Upon			Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
280	5/1/2019	Internal Facebook Wiki page titled "Active User Accounting"	FB-SINGER-00426455	FB-SINGER-00426464	Atif Hashmi Alex Schultz David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages	Meta Atif Hashmi	Explain Meta's Estimates, Metrics, and Models Expert Cross-Examination			F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403 and Meta's designation).
281		Source code file (Retained by Counsel)			Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
282	1/22/2018	Email Re: Investigate discrepancy between Cocoon & dlm_all_users audience sizes	FB-SINGER-00256694	FB-SINGER-00256697	Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages	Atif Hashmi	Expert Cross-Examination			PREJ	Balance favors admissibility (see FRE 401, 403 and Meta's designation).
283	3/15/2019	Facebook Ads Help Center web page - "Updates to Potential Reach"	FB-SINGER-00001138	FB-SINGER-00001139	Atif Hashmi Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis Atif Hashmi	Expert Foundation; Relevant to Good Faith; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models Expert Cross-Examination			PREJ	Balance favors admissibility (see FRE 401, 403 and Meta's designation).
284	8/20/2020	Age SUMA Modeling Benchmark Code	FB-SINGER-00426164	FB-SINGER-00426181	Atif Hashmi David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
285	12/21/2020	Expert Report of Dr. Greg Allenby			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
286	3/22/2021	Expert Reply Report of Dr. Greg Allenby			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
287	2/1/2021	Curriculum Vitae for Dr. Greg Allenby			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
288	Unknown	Dr. Greg Allenby OSU Profile			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages	Greg Allenby	Expert Cross-Examination			H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
289		Survey Design Presentation by Greg Allenby					Greg Allenby	Expert Cross-Examination	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
290	1/12/2015	Journal of Law and Economics article, Valuation of Patented Product Features			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages	Greg Allenby	Expert Cross-Examination			H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
291	8/0/2014	Greg Allenby, Economic Foundations of Conjoint Analysis Book (chapter)			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages	Greg Allenby	Expert Cross-Examination			H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
293		Orme, Bryan K. Getting Started with Conjoint Analysis, B.Orme, Ch 7- Sample Size Issues for Conjoint Analysis (3rd Ed)			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
295		Allenby Conjoint Survey Data - Supplemental Allenby Regression-Based Analysis Sensitivity			David Reibstein	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
297		Exhibit 1 to the Rebuttal Expert Report of David Reibstein - Reibstein Testimony in the Last Five Years			David Reibstein	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
298	2/5/2020	Article titled "Damaged Damages: Errors in Patent and False Advertising Litigation", authored by Suneal Bedi and David Reibstein			David Reibstein	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
299	8/1/2012	Article titled "The Many Flavors of ROI", authored by David Reibstein			David Reibstein	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
300	8/14/2015	David Reibstein et al, Marketing Metrics: The Manager's Guide to Measuring Marketing Performance Chapter 9 (3d ed.)			David Reibstein	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
301	7/14/2021	David Reibstein et al, Marketing Metrics: The Manager's Guide to Measuring Marketing Performance Chapter 10 (10th ed.)			David Reibstein	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
325	12/22/2020	Expert Report of Charles D. Cowan, PhD			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; PRE; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). Admissible under FRE 703 and 705.
326	3/19/2021	Expert Reply Report of Charles D. Cowan, PhD			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; PRE; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). Admissible under FRE 703 and 705.
327	3/19/2021	Exhibit 3 to the Expert Reply Report of Charles D. Cowan, PhD			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; PRE; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). Admissible under FRE 703 and 705.
328		Charles Cowan CV					Charles Cowan	Expert Cross-Examination	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
329		Facebook, Inc.'s Third Amended and Supplemental Responses and Objections to Plaintiffs' Second Set of Interrogatories			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					LC	Exhibit is not inadmissible based on the presence of legal conclusions, if any.
330	12/31/2020	Meta's Form 10-K for 2020			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Charles Cowan Catherine Tucker	Expert Cross-Examination Expert Foundation; Relevant to Disclosures			REL; MIL	MIL is opposed. The exhibit is relevant (see FRE 401, 402) and also designated by Meta.
331	Unknown	Ads Manager Screenshot			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Charles Cowan	Expert Cross-Examination			REL	The exhibit is relevant (see FRE 401, 402) and also designated by Meta.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
332	Unknown	Facebook web page "Fake Accounts" with tooltips "About Accounts Actioned" and "About Proactive Rate"			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					F; REL; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). Admissible under FRE 703 and 705.
333	3/19/2021	Expert Reply Report of Charles D. Cowan, PhD, Appendices			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Charles Cowan	Expert Cross-Examination			H; REL; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
334	12/31/2018	Meta's Form 10-K for 2018			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					F; REL; PREJ; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). MIL is opposed. Admissible under FRE 703 and 705.
337		IG-FB Account Matching Migration for Instagram Ads - Central Review	FB-SINGER-00195023	FB-SINGER-00195067			Steven Tadelis Meta, Expert	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models Instagram Accounts	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
340	10/15/2018	Transcript of Federal Trade Commission panel "Competition and Consumer Protection in the 21st Century"			Steven Tadelis	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
342	Unknown	Screenshot of Facebook's Ads Manager System			Dan Ziernicki Cain Maxwell Steven Tadelis	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
343	1991	Robert S. Pindyck & Daniel L. Rubinfeld, Econometric Models and Economic Forecasts 12.1 - The Simulation Process (3d ed. 1991)			Steven Tadelis	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
345		Course description for class taught by Catherine Tucker at MIT - Pricing, 15.818			Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
346	Spring 2010	Lecture notes from Spring 2010 MIT course 15.818 (Pricing) titled "Measuring Customer Reactions to Prices"			Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
347	Spring 2019	Syllabus for MIT class 15.818 (Pricing) for Spring 2010			Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
348	6/1/2019	June 2019 Australian Competition & Consumer Commission Report titled "Digital Platforms Inquiry"			Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
349	10/1/2019	Transcript of podcast Two Think Minimum from 10/1/2019			Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
350	3/23/2021	Expert Reply Report of Armando Levy, Ph.D			Catherine Tucker Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
351	12/22/2021	Expert Report of Dr. Timothy Roughgarden			Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
353	12/22/2020	Expert Report of Armando Levy, Ph.D.			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
355	12/22/2020	Errata to Expert Report of Amando Levy			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
357		Screen Shot of Brightland					Armando Levy	Relevant to Damages	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
358		Screen Shot of Brightland					Armando Levy	Relevant to Damages	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
359		Screen Shot of Shuttlers					Armando Levy	Relevant to Damages	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
360		Screen Shot of Shutters					Armando Levy	Relevant to Damages	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
361		Example of Meta's ads manager platform - "Budget & Schedule"	FB-SINGER-00000301	FB-SINGER-00000301	Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Cain Maxwell	Relevant to Plaintiff's Behavior; Relevant to Disclosures			F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
362	Unknown	Facebook Ad for HerLook			Armando Levy Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages					H; PRE; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403).
363	Unknown	Facebook Ad for Max Martialis			Armando Levy Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages					H; PRE; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403).
364		Screen Shot of Max Martialis Discounts	MAXWELL_00000933				Cain Maxwell	Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to damages and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
365		Cain Maxwell Facebook Ad of Copy of Gun	MAXWELL_00001137				Catherine Tucker Maxwell	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior Relevant to Plaintiff's Behavior	Prejudicial, Confusing; Relevancy	Relevant to expert foundation, Plaintiffs' behavior, advertiser's behavior, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
366		Overview of Cain Maxwell's Google Ads Campaign	MAXWELL_00000826				Maxwell	Relevant to Plaintiff's Behavior	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
367		Native of Cain Maxwell's Start Dates for Google Ads	MAXWELL_00000830				Cain Maxwell	Relevant to Plaintiff's Behavior	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
372		Cain Maxwell's Sales by Day	MAXWELL_00000824				Cain Maxwell	Relevant to Plaintiff's Behavior Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior, expert foundation, and advertiser's behavior (see FRE 401, 402).		
373		Image Chat with Suarez	MAXWELL_00001231				Maxwell	Relevant to Plaintiff's Behavior	Authenticity; Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Authenticity to be established by testimony at trial (see FRE 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
374		Cain Maxwell Facebook post of "It hurt so bad"	MAXWELL_00001106				Maxwell	Relevant to Plaintiff's Behavior	Improper Character Evidence; Prejudicial, Confusing; Relevancy	Relevant to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 607, 608), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
375		Daniel Ziernicki's Linked In Page					Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
376	12/3/2018	Email from Plaintiff Dan Ziernicki to Facebook Advertiser Support	DZ_Reserve_00021048		Dan Ziernicki	Will be used to prove Meta's liability, classwide impact, and damages	Dan Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's behavior, lack of reliance, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
377		Email re Dan Ziernicki Evidence	FB-SINGER-00302819	FB-SINGER-00302820			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's Behavior; Lack of Reliance; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
378		Email re Evidence Sent	FB-SINGER-00302736				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
379		Blackhatworld post High Quality PVA Facebook Accounts 1 (original post					Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Hearsay; Lack of Personal Knowledge; Relevancy; Prejudicial, Confusing; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to Plaintiff's behavior, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
380		Blackhatworld post High Quality PVA Facebook Accounts 2					Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Hearsay; Lack of Personal Knowledge; Relevancy; Prejudicial, Confusing; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to Plaintiff's behavior, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
381		Combined Blackhat comments by Daballerand1					Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
382	12/13/2018	Email chain between Plaintiff Dan Ziernicki and Facebook Ads Support	DZ_Reserve_00012191		Dan Ziernicki	Will be used to prove Meta's liability, classwide impact, and damages	Dan Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy		H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
383		Email re Facebook	DZ_Reserve_00023616				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's behavior, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
384	1/2/2019	Chat exchange between Plaintiff Dan Ziernicki and Facebook Advertiser Support	DZ_Reserve_00021907	DZ_Reserve_00021913	Dan Ziernicki	Will be used to prove Meta's liability, classwide impact, and damages	Dan Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's behavior, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
385		Ziarnicki chats	DZ_Reserve_00022413	DZ_Reserve_00022440			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiff's behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
386		Ziarnicki chats	DZ_Reserve_00022116	DZ_Reserve_00022116			Daniel Ziarnicki; Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation; Plaintiff's Behavior; lack of reliance; advertiser behavior; unclean hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
387		Email re Facebook	DZ_Reserve_00022772				Daniel Ziarnicki		Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's behavior, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
388	4/5/2019	Facebook post by Adam Friedman and comments	DZ_Reserve_00023648	DZ_Reserve_00023650	Dan Ziernicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiff's behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
389		DZ Reserve's Facebook Page					Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
390		Colorado Secretary of State - Greenlight Enterprises					Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's behavior, lack of reliance, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
391		Gift WOWS Facebook Page					Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Relevancy	Relevant to Plaintiff's behavior, lack of reliance, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
392	12/8/2018	Colorado Secretary of State Registration record for BlueLight Enterprises, formation date December 8, 2018					Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's behavior, lack of reliance, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
393		DZ Reserve's Google Ads Summary	DZ_Reserve_00020754				Daniel Ziernicki; Catherine Tucker	Relevant to Plaintiff's Behavior; Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior, expert foundation, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
395		Chat re Facebook	DZ_Reserve_00022290				Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's behavior, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
396		Cited Source Code			Adam Porter	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
397	3/3/2021	A. Porter CV					Adam Porter	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
398	8/31/2020	Facebook's Commercial Terms, accessible through https://www.facebook.com/legal/commercial_terms , last updated on August 31, 2020					Meta	Relevant to Unclean Hands; Relevant to Disclosures	Relevancy; Foundation	Relevant to unclean hands and disclosures (see FRE 401, 402). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
399	3/16/2021	Facebook Business Help Center article on Unique Metrics					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
401	Unknown	Ads Manager Ads Creation Process			Dan Ziernicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
402	Unknown	Ads Manager Results Data				Will be used to prove Meta's liability, classwide impact, and damages	Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay, Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
403		Potential Reach Disclosures Via Ads Manager					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
404		Screenshots of Ads Manager showing Meta's disclosures about potential reach at four points in time			Dan Ziernicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay, Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
405		Ads Manager Set Creation Flow					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and to explain Meta's estimates, metrics, and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
406		About Estimated, In-Development Metrics and Third-Party Metrics					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models; Relevant to Good Faith	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and to explain Meta's estimates, metrics, and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
407		Facebook Description of Methodology					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
408		About Data Sampling					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and to explain Meta's estimates, metrics, and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
409		About Estimated Audience Size					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and to explain Meta's estimates, metrics, and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
410		About the Structure of Facebook Ads					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and to explain Meta's estimates, metrics, and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
411		An Update on How We Count People					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and to explain Meta's estimates, metrics, and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
412		Update to Our PreCampaign Estimates					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and to explain Meta's estimates, metrics, and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
413		Facebook Business Help Center article on Unique Metrics					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
414		Facebook Business Help Center article on Unique Metrics					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
415	4/8/2021	Facebook Business Help Center webpage titled "Potential reach"			Dan Ziernicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
416	9/23/2016	Post titled "Facebook Video Metrics Update"			Yaron Fidler Alex Schultz Javier Olivan Davis Amsellem	Will be used to prove Meta's liability, classwide impact, and damages					F; REL; PREJ; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). MIL is opposed.
417		Facebook web page "Community Standards Enforcement Report"			Dan Ziernicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
418		Amazing.com correspondence with Cain Maxwell	AMAZING.COM 000001	AMAZING.COM 000014			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
419		Amazing.com Course Materials	AMAZING.COM 000015	AMAZING.COM 000026			Maxwell	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to Plaintiff's behavior, lack of reliance, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
420		Amazing.com video on creating Facebook brand page	AMAZING.COM 000136	AMAZING.COM 000136			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
421		Amazing.com video on product reviews	AMAZING.COM 000137	AMAZING.COM 000137			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
422		Amazing.com video on Launch, Blitz & Rank	AMAZING.COM 000138	AMAZING.COM 000138			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
423		Amazing.com video on Launch, Blitz & Rank Pre-launch	AMAZING.COM 000139	AMAZING.COM 000139			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
424		Amazing.com video on Launch, Blitz & Rank the Launch	AMAZING.COM 000140	AMAZING.COM 000140			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
425		AmazingSellingMachine video	AMAZING.COM 000141	AMAZING.COM 000141			Catherine Tucker; Cain Maxwell	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
426		Amazing.com video on Launch, Blitz & Rank Post-launch	AMAZING.COM 000142	AMAZING.COM 000142			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
427		Amazing.com video on performance checklist	AMAZING.COM 000143	AMAZING.COM 000143			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
428		Amazing.com video on sponsored ads	AMAZING.COM 000144	AMAZING.COM 000144			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
429		Amazing.com video on ongoing content marketing strategy	AMAZING.COM 000145	AMAZING.COM 000145			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
430		Amazing.com video on lightning deals	AMAZING.COM 000146	AMAZING.COM 000146			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
431		Amazing.com video on raving fan customer service	AMAZING.COM 000147	AMAZING.COM 000147			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
432		Amazing.com video on traffic and conversions	AMAZING.COM 000148	AMAZING.COM 000148			Cain Maxwell	Relevant to Advertiser Behavior, Relevant to Plaintiff's Behavior, Relevant to Lack of Reliance, Relevant to Damages	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to advertiser behavior, Plaintiff's behavior, lack of reliance, damages, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
439		DZ Reserve Ads Manager Reports	DZ_Reserve_00000021		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
441		DZ Reserve Ads Manager Reports	DZ_Reserve_00000025		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
442		DZ Reserve Ads Manager Reports	DZ_Reserve_00000026		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
443		DZ Reserve Ads Manager Reports	DZ_Reserve_00000027		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
444		DZ Reserve Ads Manager Reports	DZ_Reserve_00000028		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
445		DZ Reserve Ads Manager Reports	DZ_Reserve_00000037		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
446		DZ Reserve Ads Manager Reports	DZ_Reserve_00000038		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
447		DZ Reserve Ads Manager Reports	DZ_Reserve_00000039		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
448		DZ Reserve Ads Manager Reports	DZ_Reserve_00000040		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
449		DZ Reserve Ads Manager Reports	DZ_Reserve_00000041		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
452		DZ Reserve Ads Manager Reports	DZ_Reserve_00000052		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
453		DZ Reserve Ads Manager Reports	DZ_Reserve_00000053		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
454		DZ Reserve Ads Manager Reports	DZ_Reserve_00000058		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
455		DZ Reserve Ads Manager Reports	DZ_Reserve_00000059		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
456		DZ Reserve Ads Manager Reports	DZ_Reserve_00000060		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
457		DZ Reserve Ads Manager Reports	DZ_Reserve_00000061		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).
458		DZ Reserve Ads Manager Reports	DZ_Reserve_00000062		Dan Ziemicki	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
473		FB Support Email re Dan Ziemicki Account Registration	DZ_Reserve_00000109				Ziemicki	Relevant to Plaintiff's Behavior	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
474		eCom Accelerators posts	DZ_Reserve_00000140	DZ_Reserve_00000140			Catherine Tucker; Daniel Ziemicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
475		eCom Accelerators posts	DZ_Reserve_00000162	DZ_Reserve_00000166			Catherine Tucker; Daniel Ziemicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
476		eCom Accelerators posts	DZ_Reserve_00000172	DZ_Reserve_00000172			Catherine Tucker; Daniel Ziemicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
477		eCom Accelerators posts	DZ_Reserve_00000174	DZ_Reserve_00000174			Catherine Tucker; Daniel Ziemicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
478		eCom Accelerators posts	DZ_Reserve_00000176	DZ_Reserve_00000176			Catherine Tucker; Daniel Ziemicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
479		eCom Accelerators posts	DZ_Reserve_00000178	DZ_Reserve_00000178			Catherine Tucker; Daniel Ziemicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy, Confusing	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
480		eCom Accelerators posts	DZ_Reserve_00000179	DZ_Reserve_00000180			Catherine Tucker; Daniel Ziemicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy, Confusing	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
481		eCom Accelerators posts	DZ_Reserve_00000188	DZ_Reserve_00000189			Catherine Tucker; Daniel Ziemicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and witness credibility (see FRE 401, 402).		
482		Ecom Empires post	DZ_Reserve_00000194	DZ_Reserve_00000196			Catherine Tucker; Daniel Ziemicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy, confusing, hearsay, foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and witness credibility (see FRE 401, 402).		
483		Ziemicki Facebook post in eCom Accelerators Mastermind	DZ_Reserve_00000201	DZ_Reserve_00000201			Daniel Ziemicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
484		Email with Ziernicki Facebook Ads Receipt	DZ_Reserve_00000203	DZ_Reserve_00000208			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and witness credibility (see FRE 401, 402).		
485	5/8/2018	Ziernicki Facebook Ads Receipt	DZ_Reserve_00000204	DZ_Reserve_00000204			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
486	5/9/2018	Ziernicki Facebook Ads Receipt	DZ_Reserve_00000205	DZ_Reserve_00000205			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
487	5/9/2018	Ziernicki Facebook Ads Receipt	DZ_Reserve_00000206	DZ_Reserve_00000206			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
488	5/9/2018	Ziernicki Facebook Ads Receipt	DZ_Reserve_00000207	DZ_Reserve_00000207			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
489	5/9/2018	Ziernicki Facebook Ads Receipt	DZ_Reserve_00000208	DZ_Reserve_00000208			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
490		Ziernicki Facebook Ads Receipt	DZ_Reserve_00000209	DZ_Reserve_00000210			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and witness credibility (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
491		Ziarnicki Facebook ad approved email	DZ_Reserve_00000211	DZ_Reserve_00000212			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and witness credibility (see FRE 401, 402).		
492		Ziarnicki Facebook Ads Receipt	DZ_Reserve_00000213	DZ_Reserve_00000214			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and witness credibility (see FRE 401, 402).		
493		Ziarnicki Facebook Ads Receipt	DZ_Reserve_00000215	DZ_Reserve_00000217			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and witness credibility (see FRE 401, 402).		
494		Ziarnicki Facebook ad approved email	DZ_Reserve_00000335	DZ_Reserve_00000335			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and witness credibility (see FRE 401, 402).		
495	6/21/2018	Email re Gift Deals Ad Account	DZ_Reserve_00001331	DZ_Reserve_00001331			Ziarnicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Relevancy	Relevant to Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
496		Email re Ziarnicki Facebook chat request	DZ_Reserve_00001333	DZ_Reserve_00001333			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
497		Ziarnicki Facebook ad approved email	DZ_Reserve_00002011	DZ_Reserve_00002011			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and witness credibility (see FRE 401, 402).		
498		Ziarnicki Facebook Ads Receipt	DZ_Reserve_00002365	DZ_Reserve_00002365			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
499		Ziarnicki Facebook notification	DZ_Reserve_00002368	DZ_Reserve_00002368			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
500		Ziarnicki Facebook notification	DZ_Reserve_00002378	DZ_Reserve_00002378			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
501		Ziarnicki Facebook notification	DZ_Reserve_00002444	DZ_Reserve_00002444			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Prejudicial, Confusing, Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
502		Email re Ziarnicki Facebook chat request	DZ_Reserve_00003750	DZ_Reserve_00003750			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy, Confusing, Prejudicial	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
503	9/22/2018	Email re Your Appealed Ad	DZ_Reserve_00004273	DZ_Reserve_00004273			Ziarnicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Relevancy, Confusing, Prejudicial	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
504	7/30/2018	Intellectual Property Report	DZ_Reserve_00004719	DZ_Reserve_00004719			Ziarnicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
505	4/8/2018	Dan Ziernicki email re Facebook Chat Request	DZ_Reserve_00004922	DZ_Reserve_00004922			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
506		Ziernicki Facebook Ads Receipt	DZ_Reserve_00007041	DZ_Reserve_00007041			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
507	9/14/2018	Email re Facebook Chat Request	DZ_Reserve_00007073	DZ_Reserve_00007073			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Other; Prejudicial, Confusing; Relevancy	"Other" is not a ground for objection. Relevant to Plaintiffs' behavior, advertiser behavior, lack of reliance, damages, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
508		Ziernicki Facebook ad approved email	DZ_Reserve_00007855	DZ_Reserve_00007855			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
509	9/26/2018	Dan Ziernicki email re Facebook Chat Request	DZ_Reserve_00007929	DZ_Reserve_00007929			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
510	11/6/2018	Email re Massive Traffic	DZ_Reserve_00010280	DZ_Reserve_00010280			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
511	11/12/2018	Facebook Chat Request	DZ_Reserve_00010801	DZ_Reserve_00010801			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
512	12/17/2018	Email re Status of your Facebook Ads Appeal	DZ_Reserve_00012203	DZ_Reserve_00012203			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
513	8/15/2018	Facebook Chat Request	DZ_Reserve_00012340	DZ_Reserve_00012341			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
514	9/12/2018	Dan Ziernicki email re Facebook Chat Request	DZ_Reserve_00012372	DZ_Reserve_00012372			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
515	9/27/2018	Facebook Chat Request	DZ_Reserve_00013377	DZ_Reserve_00013377			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
516		Draft kings email including daballerand1 username	DZ_Reserve_00014909	DZ_Reserve_00014910			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to Plaintiffs' behavior, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
517	11/2/2018	Massive Traffic	DZ_Reserve_00016555	DZ_Reserve_00016555			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
518	12/3/2018	Facebook Chat Request	DZ_Reserve_00020121	DZ_Reserve_00020121			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
519	12/5/2018	Email re Facebook Chat Request	DZ_Reserve_00020188	DZ_Reserve_00020190			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
520	6/20/2018	Facebook Chat Request	DZ_Reserve_00020383	DZ_Reserve_00020383			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
521		Ziernicki Facebook chat request	DZ_Reserve_00020388	DZ_Reserve_00020389			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to Plaintiffs' Behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
522	6/21/2018	Ziernicki Facebook chat request	DZ_Reserve_00020392	DZ_Reserve_00020394			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402)		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
523		Ziernicki Facebook chat request	DZ_Reserve_00020448	DZ_Reserve_00020451			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
524		Ziernicki Facebook chat request	DZ_Reserve_00020453	DZ_Reserve_00020457			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
525	8/7/2018	Facebook Chat Request	DZ_Reserve_00020467	DZ_Reserve_00020467			Ziernicki	Relevant to Unclean Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
526	8/28/2018	Facebook Chat Request	DZ_Reserve_00020536	DZ_Reserve_00020536			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
527	9/11/2018	Facebook Chat Request	DZ_Reserve_00020566	DZ_Reserve_00020566			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
528	9/26/2018	Dan Ziernicki email re Facebook Chat Request	DZ_Reserve_00020604	DZ_Reserve_00020606			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
529	11/2/2018	Facebook Chat Request	DZ_Reserve_00020700	DZ_Reserve_00020700			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
530	11/6/2018	Facebook Chat Request	DZ_Reserve_00020721	DZ_Reserve_00020721			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
531		Ziarnicki campaign data	DZ_Reserve_00020818	DZ_Reserve_00020818			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, and background (see FRE 401, 402).		
532		Buy Shop Deals data	DZ_Reserve_00020914	DZ_Reserve_00020914			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, and background (see FRE 401, 402).		
533		Buy Shop Deals data	DZ_Reserve_00020917	DZ_Reserve_00020917			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, and background (see FRE 401, 402).		
534		Beauty Deals Instagram web data collection report	DZ_Reserve_00020922	DZ_Reserve_00020942			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Prejudicial, Confusing, Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
535		Advertisement for "MuscleMax Buttock Trainer"	DZ_Reserve_00020932	DZ_Reserve_00020942			Ziarnicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
536	11/28/2018	Facebook Chat	DZ_Reserve_00021009	DZ_Reserve_00021009			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Hearsay; Improper Character Evidence; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 607, 608). Relevant to Plaintiffs' behavior, background, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
537		Ziernicki Amex dispute letter	DZ_Reserve_00021588	DZ_Reserve_00021589			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
538		DZ Reserve's statement of refund from American Express of money DZ Reserve paid to Facebook which he sought to recover as a result of a separate dispute with Facebook.	DZ_Reserve_00021590				DZ, Expert	Relevant to Plaintiff's Behavior, Relevant to Unclean Hands, Relevant to Lack of Reliance, Relevant to Damages	Foundation; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Relevant to Plaintiffs' behavior, background, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
539		Video advertisement for "Facial Muscles Exercisor"	DZ_Reserve_00021602				Ziernicki	Relevant to Plaintiff's Behavior	Prejudicial, Confusing; Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
540		Facebook web data collection report	DZ_Reserve_00021599	DZ_Reserve_00021621			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance	Hearsay; Prejudicial, Confusing; Relevancy			

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
541		Facebook web data collection report	DZ_Reserve_00021603	DZ_Reserve_00021605					Prejudicial, Confusing; Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
542	3/12/2020	Video Attachment to Facebook web data collection report	DZ_Reserve_00021606				Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, unclear hands, advertiser behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
543		MuscleMax W3 IGS pdf advertisement	DZ_Reserve_00021611	DZ_Reserve_00021613			Daniel Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
544		MuscleMax W3 IGS video advertisement	DZ_Reserve_00021614	DZ_Reserve_00021614			Daniel Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
545		PDF advertisement for "Photon"	DZ_Reserve_00021627	DZ_Reserve_00021629			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
546		Video advertisement for "Photon"	DZ_Reserve_00021630				Ziernicki	Relevant to Plaintiff's Behavior	Prejudicial, Confusing; Relevancy	Relevant to Plaintiffs' behavior, background, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
547		Ziernicki ad data	DZ_Reserve_00021643	DZ_Reserve_00021645			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, advertiser behavior, background, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
548		WW Physical Exercise video advertisement	DZ_Reserve_00021643	DZ_Reserve_00021645			Daniel Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
549		WW Physical Exercise video advertisement	DZ_Reserve_00021646	DZ_Reserve_00021646			Daniel Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
550		Spider Vein Eraser pdf advertisement	DZ_Reserve_00021647	DZ_Reserve_00021649			Daniel Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
551		Spider Vein Eraser video advertisement	DZ_Reserve_00021650	DZ_Reserve_00021650			Daniel Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
552		Elastic IGS Bunion Corrector video advertisement	DZ_Reserve_00021651	DZ_Reserve_00021651			Daniel Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
553		Elastic IGS Bunion Corrector pdf advertisement	DZ_Reserve_00021652	DZ_Reserve_00021654			Daniel Ziernicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
554		Ziernicki chats	DZ_Reserve_00021688	DZ_Reserve_00021693			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
555		Ziernicki chats	DZ_Reserve_00021696	DZ_Reserve_00021699			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
556	7/1/2018	Ziernicki chats	DZ_Reserve_00021704	DZ_Reserve_00021705			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
557		Ziernicki chats	DZ_Reserve_00021714	DZ_Reserve_00021722			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
558		Cody Emsky message	DZ_Reserve_00021736	DZ_Reserve_00021736			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
559	12/1/2018	Ziarnicki chats	DZ_Reserve_00021753	DZ_Reserve_00021754			Ziarnicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, advertiser behavior, lack of reliance, damages, unclear hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
560	12/31/2018	Ziarnicki chat	DZ_Reserve_00021779	DZ_Reserve_00021795			Daniel Ziarnicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, unclear hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
561		Ziarnicki chats	DZ_Reserve_00021854	DZ_Reserve_00021869			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
562	12/5/2018	Facebook Chat	DZ_Reserve_00021883	DZ_Reserve_00021894			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
563		Ziernicki chats	DZ_Reserve_00021914	DZ_Reserve_00021922			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
564	5/10/2018	Audio File Attachment to Ziernicki chats	DZ_Reserve_00021930				Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance	Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, unclear hands, advertiser behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
565	5/10/2018	Audio File Attachment to Ziernicki chats	DZ_Reserve_00021931				Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance	Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, unclean hands, advertiser behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
566	5/10/2018	Audio File Attachment to Ziernicki chats	DZ_Reserve_00021932				Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance	Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, unclean hands, advertiser behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
567	5/10/2018	Audio File Attachment to Ziernicki chats	DZ_Reserve_00021933				Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance	Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, unclean hands, advertiser behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
568	5/10/2018	Audio File Attachment to Ziernicki chats	DZ_Reserve_00021934				Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance	Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, unclean hands, advertiser behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
569		Ziernicki chats	DZ_Reserve_00021935	DZ_Reserve_00021951			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
570		Ziernicki chats	DZ_Reserve_00021957	DZ_Reserve_00021965			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
571		Ziernicki chats	DZ_Reserve_00021983	DZ_Reserve_00022018			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
572		Ziernicki Chats	DZ_Reserve_00021985				Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, lack of reliance, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
573		Ziernicki Facebook chat with Florian Tep with attachments	DZ_Reserve_00022002	DZ_Reserve_00022002			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
574		Ziernicki chats	DZ_Reserve_00022021	DZ_Reserve_00022027			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
575	6/13/2018	Ziernicki chat	DZ_Reserve_00022037	DZ_Reserve_00022046			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
576		Hey bro how are you scaling recently_.docx	DZ_Reserve_00022047	DZ_Reserve_00022050			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
577		Ziarnicki chats	DZ_Reserve_00022059	DZ_Reserve_00022064			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
578		Ziarnicki chats	DZ_Reserve_00022069	DZ_Reserve_00022070			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
579	12/20/2018	Ziarnicki chats	DZ_Reserve_00022072	DZ_Reserve_00022075			Ziarnicki	Relevant to Plaintiff's Behavior	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
580	6/22/2018	Ziernicki chats	DZ_Reserve_00022097	DZ_Reserve_00022100			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
581		Ziernicki chats	DZ_Reserve_00022114	DZ_Reserve_00022154			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
582		Ziernicki chats	DZ_Reserve_00022183	DZ_Reserve_00022183			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, lack of reliance, damages, unclear hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
583		Ziarnicki chats	DZ_Reserve_00022193	DZ_Reserve_00022193			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
584		Ziarnicki chats	DZ_Reserve_00022195	DZ_Reserve_00022195			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
585		Ziarnicki chats	DZ_Reserve_00022232	DZ_Reserve_00022236			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
586		Ziernicki chats	DZ_Reserve_00022263	DZ_Reserve_00022283			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
587		Ziernicki chats	DZ_Reserve_00022378	DZ_Reserve_00022401			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
588		Ziernicki chats	DZ_Reserve_00022444	DZ_Reserve_00022453			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
588		Ziernicki chats	DZ_Reserve_00022463	DZ_Reserve_00022487			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
590		Ziernicki chats	DZ_Reserve_00022492	DZ_Reserve_00022537			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
591	6/5/2018	Ziernicki chats	DZ_Reserve_00022509	DZ_Reserve_00022537			Ziernicki	Relevant to Unclean Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to Plaintiffs' behavior, lack of reliance, advertiser behavior, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
592		Ziernicki chats	DZ_Reserve_00022561	DZ_Reserve_00022561			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
593	6/27/2018	Ziernicki chats	DZ_Reserve_00022629	DZ_Reserve_00022664			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands; Relevant to Advertiser Behavior;	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Relevant to expert foundation, Plaintiffs' behavior, advertiser behavior, lack of reliance, damages, unclean hands, background, witness credibility and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
594		Ziernicki chats	DZ_Reserve_00022668	DZ_Reserve_00022673			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
595		Ziernicki chats	DZ_Reserve_00022675	DZ_Reserve_00022678			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
596		Ziernicki chats	DZ_Reserve_00022681	DZ_Reserve_00022686			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
597		Ziernicki chats	DZ_Reserve_00022691	DZ_Reserve_00022691 4			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
598	8/2/2018	Ziernicki chats	DZ_Reserve_00022695	DZ_Reserve_00022720			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiffs' behavior, advertiser behavior, lack of reliance, damages, unclear hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
599		Ziernicki chats	DZ_Reserve_00022725	DZ_Reserve_00022733			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclear hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
600		Ziernicki chats	DZ_Reserve_00022740	DZ_Reserve_00022741			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclear hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
601		Ziernicki chats	DZ_Reserve_00022755	DZ_Reserve_00022756			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
602		Ziernicki chats	DZ_Reserve_00022769	DZ_Reserve_00022770			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
603		Ziernicki chats	DZ_Reserve_00022779	DZ_Reserve_00022783			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
604		Ziernicki chats	DZ_Reserve_00022791	DZ_Reserve_00022792			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
605		Ziernicki chats	DZ_Reserve_00022799	DZ_Reserve_00022800			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
606		Ziernicki chats	DZ_Reserve_00022803	DZ_Reserve_00022804			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
607		Ziernicki chats	DZ_Reserve_00022812	DZ_Reserve_00022812			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
608		Ziernicki chats	DZ_Reserve_00022825	DZ_Reserve_00022827			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
609		Ziernicki chats	DZ_Reserve_00022848	DZ_Reserve_00022848			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
610		Ziernicki chats	DZ_Reserve_00023125	DZ_Reserve_00023126			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
611		Ziernicki chats	DZ_Reserve_00023174	DZ_Reserve_00023174			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
612		Ziernicki chats	DZ_Reserve_00023182	DZ_Reserve_00023184			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
613		Ziarnicki chats	DZ_Reserve_00023283	DZ_Reserve_00023283			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
614	5/16/2018	Ziarnicki chat	DZ_Reserve_00023293	DZ_Reserve_00023364			Daniel Ziarnicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance	Hearsay; Prejudicial, Confusing; Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
615		Ziarnicki chats	DZ_Reserve_00023337	DZ_Reserve_00023350			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
616		Ziarnicki chats	DZ_Reserve_00023353	DZ_Reserve_00023363			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
617		Ziarnicki chats	DZ_Reserve_00023374	DZ_Reserve_00023384			Catherine Tucker; Daniel Ziarnicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
618		Ziarnicki chats	DZ_Reserve_00023440	DZ_Reserve_00023447			Ziarnicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
619		Ziernicki chats	DZ_Reserve_00023456	DZ_Reserve_00023505			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
620		Ziernicki chats	DZ_Reserve_00023588	DZ_Reserve_00023596			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
621		Ziernicki chats	DZ_Reserve_00023610	DZ_Reserve_00023614			Ziernicki	Relevant to Unclear Hands; Relevant to Plaintiff's Behavior; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
622		Message from Ziernicki about getting back onto Facebook in December 2018	DZ_Reserve_00023624	DZ_Reserve_00023627			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiffs' behavior, lack of reliance, damages, unclean hands, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
623		ad data	DZ_Reserve_00023629	DZ_Reserve_00023629			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
625		ad data	DZ_Reserve_00023835	DZ_Reserve_00023882			Catherine Tucker; Daniel Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Relevancy	Relevant to expert foundation, Plaintiffs' behavior, lack of reliance, damages, unclean hands, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
626	10/29/2020	D. Ziernicki Shopify Report	DZ_Reserve_00023853	DZ_Reserve_00023857			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Authenticity; Foundation; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
627		D. Ziernicki Shopify Report	DZ_Reserve_00023861	DZ_Reserve_00023861			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
628		D. Ziernicki Shopify Report	DZ_Reserve_00023862	DZ_Reserve_00023862			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
629		D. Ziernicki Shopify Report	DZ_Reserve_00023863	DZ_Reserve_00023863			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
630	11/5/2020	Data produced by Plaintiffs with file name "BSD Sales by traffic referrer_2017-01-01_2019-04-05.csv"	DZ_Reserve_00023874	DZ_Reserve_00023874	Dan Ziernicki	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert foundation; Relevant to Advertiser Behavior; Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to expert foundation, advertiser behavior, Plaintiffs' behavior, lack of reliance, damages, and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
631		D. Ziernicki Shopify Report	DZ_Reserve_00023874	DZ_Reserve_00023874			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
633	9/14/2018	Dan Ziernicki email re Facebook Chat Request	DZ_Reserve_0020587	DZ_Reserve_0020587			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
634		About Ad Targeting	FB-SINGER-00000002	FB-SINGER-00000003			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
635	7/26/2013	Document produced by Facebook titled "Facebook Advertising Guidelines"	FB-SINGER-00000026	FB-SINGER-00000031	Charles Cowan Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					F; REL; PREJ; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). MIL is opposed. Admissible under FRE 703 and 705.
636	10/22/2013	Document produced by Facebook titled "Facebook Advertising Guidelines"	FB-SINGER-00000032	FB-SINGER-00000037	Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					F; PREJ; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). MIL is opposed. Admissible under FRE 703 and 705.
637	12/19/2013	Document produced by Facebook titled "Facebook Advertising Guidelines"	FB-SINGER-00000038	FB-SINGER-00000043	Charles Cowan Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					F; REL; PREJ; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). MIL is opposed. Admissible under FRE 703 and 705.
644		Facebook's Community Payment Terms rev'd July 2016	FB-SINGER-00000183	FB-SINGER-00000187			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to background, disclosures, and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
645	9/6/2016	Facebook Community Payment Terms	FB-SINGER-00000188	FB-SINGER-00000192	Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to background, disclosures, and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).	F; REL; PREJ; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). MIL is opposed. Admissible under FRE 703 and 705.
646		Facebook's Community Payment Terms rev'd October 2016	FB-SINGER-00000193	FB-SINGER-00000197			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to background, disclosures, and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
647		Facebook's Community Payment Terms rev'd November 2016	FB-SINGER-00000198	FB-SINGER-00000202			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to background, disclosures, and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
648		Facebook's Community Payment Terms rev'd November 2017	FB-SINGER-00000208	FB-SINGER-00000212			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to background, disclosures, and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
649		Facebook's Community Payment Terms rev'd January 2018	FB-SINGER-00000213	FB-SINGER-00000217			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to background, disclosures, and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
650		Facebook's Community Payment Terms rev'd May 2018	FB-SINGER-00000218	FB-SINGER-00000221			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to background, disclosures, and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
651		Facebook's Community Payment Terms rev'd October 2018	FB-SINGER-00000222	FB-SINGER-00000225			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to background, disclosures, and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
652	1/31/2019	Screenshot of Facebook's Ads Manager System showing "How this number is estimated" tooltip	FB-SINGER-00000300		Dan Ziernicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
659	1/1/2019	About Potential Reach	FB-SINGER-00000330	FB-SINGER-00000332			Catherine Tucker; Steven Tadelis Meta	Expert Foundation; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
671		Facebook's Self-Serve Ad Terms effective May 2018	FB-SINGER-00000400	FB-SINGER-00000401			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and unclean hands (FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
672		Terms of Service	FB-SINGER-00000402	FB-SINGER-00000407			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and unclean hands (FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
678	2/5/2019	Article titled "About Ad Targeting," from the Facebook Business Help Center, dated February 5, 2019	FB-SINGER-00000417	FB-SINGER-00000422			Catherine Tucker	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
679		Facebook's Self-Serve Ad Terms	FB-SINGER-00000431	FB-SINGER-00000431			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Foundation; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and unclean hands (FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
680		Facebook's Self-Serve Ad Terms	FB-SINGER-00000432	FB-SINGER-00000432			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Foundation; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures and unclean hands (FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
681		About Data Sampling	FB-SINGER-00000433	FB-SINGER-00000434			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models				
682	5/20/2019	Facebook Ads Help Center web page - "About Estimated Metrics and In Development Metrics"	FB-SINGER-00000435	FB-SINGER-00000438	Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
683		Troubleshoot Reasons Why Ad Metrics May Not Add Up	FB-SINGER-00000439	FB-SINGER-00000441			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models				

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
684		Ads Targeting - A Facebook Ads Tutorial	FB-SINGER-00000443	FB-SINGER-00000443			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
685		Ads Bidding - A Facebook Ads Tutorial	FB-SINGER-00000445	FB-SINGER-00000445			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
686		Ads Manager - A Facebook Ads Tutorial	FB-SINGER-00000446	FB-SINGER-00000446			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
687		Targeting Audience Definition - A Facebook Tutorial	FB-SINGER-00000457	FB-SINGER-00000457			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
688		Targeting - Main Fields - A Facebook Tutorial	FB-SINGER-00000458	FB-SINGER-00000458			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
689	3/24/2017	Presentation produced by Facebook with filename "cococon+DAPL.pptx"	FB-SINGER-00000702		Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
690	4/30/2019	Internal Facebook Wiki page titled "Components"	FB-SINGER-00001076	FB-SINGER-00001081	Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages	Porter	Expert Foundation			F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). Admissible under FRE 703 and 705.
691	4/30/2019	Internal Facebook Wiki page titled "How does it work?"	FB-SINGER-00001082		Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
692		InventoryEstimator - wiki	FB-SINGER-00001087	FB-SINGER-00001115			Steven Tadelis	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models; Relevant to Disclosures	Foundation; Hearsay; Lack of Personal Knowledge	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
693		Wiki Ads Creation and Editing Overview	FB-SINGER-00001105	FB-SINGER-00001115			Catherine Tucker	Expert Foundation; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Hearsay; Lack of Personal Knowledge	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
694	3/15/2019	Article titled "About Potential Reach," from the Facebook Business Help Center, accessed on March 15, 2019	FB-SINGER-00001119	FB-SINGER-00001121			Meta, Experts	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
695		Metrics Updates	FB-SINGER-00001122	FB-SINGER-00001124			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
696	8/27/2019	Ads Manager screenshot with help page titled "About Targeting New Audiences"	FB-SINGER-00001125	FB-SINGER-00001139	Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Steven Tadelis David Reibstein	Expert Foundation; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models Expert Foundation; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
697	8/27/2019	Ads Manager screenshot with criteria Location - United States and Age - 18-65+ selection	FB-SINGER-00001126	FB-SINGER-00001126	Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Good Faith; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
701	8/27/2019	Ads Manager screenshot with help page titled "About Estimated Daily Results"	FB-SINGER-00001130	FB-SINGER-00001130	Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Good Faith; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
703	8/27/2019	Ads Manager screenshot with help page titled "About the Delivery System: Placements"	FB-SINGER-00001132		Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Alex Schultz; Amy Dunn; Rob Goldman	Ads Manager			F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
704	8/27/2019	Ads Manager screenshot showing tooltip "How this number is estimated (details)"	FB-SINGER-00001133	FB-SINGER-00001133	Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Meta, Experts	Help Center/Ads Manager			F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
705	8/27/2019	Ads Manager screenshot showing tooltip "How this number is estimated (overview)"	FB-SINGER-00001134	FB-SINGER-00001134	Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Good Faith; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
706	8/27/2019	Ads Manager Screenshot - About Potential Reach	FB-SINGER-00001135		Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
708	8/29/2018	Email chain between Facebook employees "RE: Revenue levers in targeting"	FB-SINGER-00003746	FB-SINGER-00003757	Armando Levy Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ; MIL	MIL is opposed; Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
709	2/20/2019	Email chain between Facebook employees "Re: Potential Reach Change: Agency/Brand Comms and getting them in front of our client teams"	FB-SINGER-00022619	FB-SINGER-00022623	Charles Cowan Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H; F; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). Admissible under FRE 703 and 705.
710	3/23/2018	Global Sales FYI	FB-SINGER-00025893		Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
711		Document titled "Understanding the Value of Detailed Targeting," dated August 30, 2018	FB-SINGER-00027996				Josh Geller	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
712	11/21/2017	Task: Discrepancy between the potential audience and max estimated daily reach	FB-SINGER-00050387		Alex Schultz Javier Olivan Rob Goldman Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					H; F; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
713	10/7/2014	Document produced by Facebook titled "Key challenges Google faces:	FB-SINGER-00054435	FB-SINGER-00054452	Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
715		Document produced by Facebook showing posts made by Trevor Ford	FB-SINGER-00060514		Amy Dunn Alex Schultz Javier Olivan David Amsallem Yaron Fidler Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
716	7/29/2019	Taking out reach estimation - Pre read	FB-SINGER-00061026		Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
717		Introduction to outcome prediction	FB-SINGER-00061981	FB-SINGER-00061999			Steven Tadelis; Josh Geller	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Hearsay; Lack of Personal Knowledge	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
722	10/5/2018	Pillar Review - Potential Reach	FB-SINGER-00074737	FB-SINGER-00074755			Steven Tadelis; Yaron Fidler; Alexander Lobert; Rahul Bhandari	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
723	12/20/2017	Potential Reach Estimates Removal - Revenue Impact	FB-SINGER-00075230		Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					F; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
724	9/12/2017	Ad Auction and Delivery Overview	FB-SINGER-00077426	FB-SINGER-00077474			Catherine Tucker; Steven Tadelis	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Relevant to Good Faith	Foundation; Hearsay; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
725	10/23/2017	Posts in group "Reach Estimation Infrastructure"	FB-SINGER-00077824		Amy Dunn Alex Schultz Javier Olivan David Amsallem Yaron Fidler Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					F; REL; PREJ	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
726	9/11/2017	Presenation produced by Facebook titled "Audience Estimator / Potential Reach Update & Comms"	FB-SINGER-00084486	FB-SINGER-00084506	Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). MIL is opposed. Balance favors admissibility (see FRE 401, 403).
727	11/5/2018	Document produced by Facebook titled "Reactive Messaging for Press Around Facebook's Potential Reach Versus Census Estimates"	FB-SINGER-00087770	FB-SINGER-00087772	Armando Levy Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages	Amy Dunn	Relevant to Good Faith; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models			PREJ; MIL	MIL is opposed; Balance favors admissibility (see FRE 401, 403).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
728		Impact of SUMA Modeling on R&F Audience Sizes	FB-SINGER-00087812	FB-SINGER-00087816			Steven Tadelis; David Amsalem	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
729	1/29/2019	Internal Facebook wiki titled "Implementation at a High Level"	FB-SINGER-00088107	FB-SINGER-00088109	Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages	Porter	Expert Foundation	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
731	1/1/2014	Internal Facebook wiki page titled "AdsFest 2014"	FB-SINGER-00088221	FB-SINGER-00088223	Greg Allenby Timothy Roughgarden Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
732		Facebook's Self-Serve Ad Terms	FB-SINGER-00088232	FB-SINGER-00088233			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to background, disclosures, and unclean hands (FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
733		Facebook Terms of Service rev'd April 2018	FB-SINGER-00088235	FB-SINGER-00088243			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to background, disclosures, and unclean hands (FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
734	10/15/2019	Facebook document titled "Prep for 9/13 design"	FB-SINGER-00088690	FB-SINGER-00088706	Armando Levy Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					F; AUTH	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
735	10/7/2019	Internal Facebook wiki page titled "Bid Suggestion and Delivery Prediction"	FB-SINGER-00088787	FB-SINGER-00088791	Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
736		Components - wiki	FB-SINGER-00088794	FB-SINGER-00088798			Steven Tadelis	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
737	10/7/2019	Internal Facebook wiki page titled "SUMA Data & Analysis"	FB-SINGER-0008862	FB-SINGER-0008872	Alex Schultz Yaron Fidler Amy Dunn Javier Olivan David Amsellem	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
742		About Delivery Insights	FB-SINGER-00089360	FB-SINGER-00089360			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
743		About Auction Competition	FB-SINGER-00089362	FB-SINGER-00089362			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
744		About Auction Competition	FB-SINGER-00089363	FB-SINGER-00089363			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
745		About Auction Competition	FB-SINGER-00089364	FB-SINGER-00089364			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
746		What is the Auction Competitiveness Index?	FB-SINGER-00089365	FB-SINGER-00089365			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
748		About Bid Cap	FB-SINGER-00089368	FB-SINGER-00089368			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
749		About Bid Cap	FB-SINGER-00089369	FB-SINGER-00089369			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
751		About Cost Control	FB-SINGER-00089371	FB-SINGER-00089371			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
752		About Cost Control	FB-SINGER-00089372	FB-SINGER-00089372			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
753		About Cost and Bid Controls	FB-SINGER-00089373	FB-SINGER-00089373			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
755		About Cost Cap	FB-SINGER-00089375	FB-SINGER-00089375			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
756		About Cost Cap	FB-SINGER-00089376	FB-SINGER-00089376			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
757		About Cost Cap	FB-SINGER-00089377	FB-SINGER-00089377			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
759		About Highest Value	FB-SINGER-00089379	FB-SINGER-00089379			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
760		About Highest Value	FB-SINGER-00089380	FB-SINGER-00089380			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
762		About Minimum ROAS	FB-SINGER-00089384	FB-SINGER-00089384			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
763		About Minimum ROAS	FB-SINGER-00089386	FB-SINGER-00089386			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
765		About Minimum ROAS Controls	FB-SINGER-00089388	FB-SINGER-00089388			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
766		About Minimum ROAS Controls	FB-SINGER-00089389	FB-SINGER-00089389			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
767		About Minimum ROAS Controls	FB-SINGER-00089390	FB-SINGER-00089390			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
771		Choose the Right Buying Type for your Brand Campaign	FB-SINGER-00089423	FB-SINGER-00089424			Catherine Tucker; Steven Tadelis Alex Schultz; Amy Dunn; Rob Goldman	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction; Relevant to Good Faith Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
772		Commerce Policies	FB-SINGER-00089440	FB-SINGER-00089442			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Prejudicial, Confusing; Relevancy	Relevant to disclosures and to explain Meta's estimates, metrics, and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
773	4/4/2018	Facebook Commercial Terms rev'd April 4, 2018	FB-SINGER-00089443	FB-SINGER-00089446			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
774	5/25/2018	Facebook Commercial Terms rev'd May 25, 2018	FB-SINGER-00089447	FB-SINGER-00089450			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
775		Facebook Commercial Terms effective May 25, 2018	FB-SINGER-00089451	FB-SINGER-00089454			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
776	5/25/2018	Facebook's Commercial Terms, effective May 25, 2018	FB-SINGER-00089455	FB-SINGER-00089456			Meta	Relevant to Unclean Hands; Relevant to Disclosures	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
783		R&F Overview wiki	FB-SINGER-00089670	FB-SINGER-00089711			Catherine Tucker; Steven Tadelis	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction; Relevant to Good Faith	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
784	4/19/2018	Presentation produced by Facebook titled "Audience Size and People Narrative"	FB-SINGER-00091723		Yaron Fidler Amy Dunn Rob Goldman David Amsellem	Will be used to prove Meta's liability, classwide impact, and damages					H; F; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403).
785	6/27/2018	Facebook email chain "Re: Decision required - SUMA integration into delivery"	FB-SINGER-00092767	FB-SINGER-00092775	Armando Levy Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					H; PREJ; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
786	3/29/2018	Presentation produced by Facebook titled "Audience Size Alternatives"	FB-SINGER-00093979		Greg Allenby Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
787		About Ad Relevance Diagnostics	FB-SINGER-00095150	FB-SINGER-00095150			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
788		About Quality Ranking	FB-SINGER-00095155	FB-SINGER-00095155			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
789		SUMA in Cocoon	FB-SINGER-00095217	FB-SINGER-00095225			Steven Tadelis	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Hearsay; Lack of Personal Knowledge	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
790	6/19/2017	2017 SUMA analysis by country	FB-SINGER-00100687	FB-SINGER-00101213	Alex Schultz Yaron Fidler Amy Dunn David Amsallem Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
791	2/21/2019	Document produced by Facebook titled "DC&G Competitive Analysis"	FB-SINGER-00103337	FB-SINGER-00103361	Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
792	3/22/2018	Presentation produced by Facebook titled "Central External Metrics Program"	FB-SINGER-00118593		Alex Schultz Yaron Fidler Rob Goldman Amy Dunn Javier Olivan David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
795	10/5/2018	Document produced by Facebook titled "Pillar Review - Potential reach"	FB-SINGER-00122904	FB-SINGER-00122922	Armando Levy Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. The exhibit is relevant (see FRE 401, 402).
796	3.732019	Deep-Dive FAQ on Potential Reach Update	FB-SINGER-00123652	FB-SINGER-00123659			Alexander Lobert, Amy Dunn	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models; Relevant to Disclosures	Hearsay; Lack of Personal Knowledge; Foundation	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
797	3/6/2019	Data on Impact to advertisers of March 2019 potential reach change	FB-SINGER-00125331;FB-SINGER-00125550;FB-SINGER-00125801;FB-SINGER-00125874;FB-SINGER-00170049		Yaron Fidler Amy Dunn David Amsallem Alex Schultz Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
798	6/1/2018	Reach Estimation New Solution Test	FB-SINGER-00126434		Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
800		Updates to Potential Reach	FB-SINGER-00128288	FB-SINGER-00128288			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
801		Potential Reach	FB-SINGER-00128289	FB-SINGER-00128289			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
803		transcript of interview for advertiser feedback	FB-SINGER-00130129	FB-SINGER-00130146			Catherine Tucker	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Good Faith	Authenticity; Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to advertiser behavior (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
804	10/11/2018	transcript of interview for advertiser feedback	FB-SINGER-00130147	FB-SINGER-00130164			Catherine Tucker	Expert Foundation; Relevant to Advertiser Behavior; Relevant to Good Faith	Authenticity; Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to advertiser behavior (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
805	9/14/2017	Sales FYI: Comparing Potential Audience Size Estimates	FB-SINGER-00140190	FB-SINGER-00140246			Amy Dunn	Relevant to Good Faith; Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
806	1/15/2019	Potential Reach Change BPM Leadership Review	FB-SINGER-00140626	FB-SINGER-00140643			Alexander Lobert, Rahul Bhandari, Yaron Fidler,	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902)		
808	9/21/2017	Summary: Long-term Solutions for Potential Reach	FB-SINGER-00146144		Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
811	3/22/2018	Document produced by Facebook titled "Integrating SUMA and age modeling into Reach Estimates delivery review - 3/22/18"	FB-SINGER-00150119	FB-SINGER-00150133	Armando Levy Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					MIL; PREJ	MIL is opposed; Balance favors admissibility (see FRE 401, 403). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
812	4/2/2019	Facebook document titled "2019Q1 Targeting Fixathon copy"	FB-SINGER-00150947	FB-SINGER-00150251	Yaron Fidler Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					F; REL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
813	1/24/2019	Email chain between Facebook employees "Re: Decision required - SUMA integration into delivery"	FB-SINGER-00165823	FB-SINGER-00165833	Armando Levy David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					PRE; MIL	MIL is opposed; Balance favors admissibility (see FRE 401, 403).
815	2/20/2019	Spreadsheet file named "Potential Reach Impact on Audience Size by Country and Age.xlsx"	FB-SINGER-00170105		Charles Cowan David Amsallem	Will be used to prove Meta's liability, classwide impact, and damages					H; F; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). MIL is opposed. Admissible under FRE 703 and 705.
816		ad data	FB-SINGER-00180465	FB-SINGER-00180472			Catherine Tucker Steven Tadelis	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Relevant to Good Faith Expert Foundation; Relevant to Advertiser Behavior	Other; Prejudicial, Confusing; Relevancy	Relevant to Meta's estimates, metrics, and models, good faith, and advertiser behavior (see FRE 401, 402).		
817		all_ads_details table for Plaintiff Dan Ziernicki	FB-SINGER-00180466		Dan Ziernicki	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
819	1/30/2020	Targeting data for Plaintiff Dan Ziernicki	FB-SINGER-00180469		Dan Ziernicki	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
821	12/17/2018	Document produced by Facebook titled "Potential Reach Change - Central External Metrics Review"	FB-SINGER-00183561	FB-SINGER-00183596	Armando Levy Amy Dunn Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Amy Dunn; Steven Tadelis; David Amsallem	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Relevant to Good Faith; Potential Reach and Ad Impressions			REL	The exhibit is relevant (see FRE 401, 402).
822	9/8/2017	Quip titled "Pre-Reading Audience Estimator / Potential Reach Update & Comms September 8th (A/C Priv)"	FB-SINGER-00183784	FB-SINGER-00183790			Rob Goldman, Amy Dunn, Yaron Fidler	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
823	11/19/2019	Internal Facebook wiki page titled "Pacing Algorithms Overview"	FB-SINGER-00187005	FB-SINGER-00187006	Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
824	11/19/2019	Internal Facebook wiki page titled "Step by step"	FB-SINGER-00187068	FB-SINGER-00187070	Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Steven Tadelis	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction; Relevant to Good Faith	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
825	11/19/2019	Internal Facebook wiki titled "VCG"	FB-SINGER-00187088	FB-SINGER-00187090	Armando Levy Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Steven Tadelis	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction; Relevant to Good Faith	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
826	1/8/2020	Document produced by Facebook titled "Dissecting effective CPM (eCPM)"	FB-SINGER-00187226		Armando Levy Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
829	12/17/2018	Document produced by Facebook titled "Potential Reach Change - Central External Metrics Review"	FB-SINGER-00187790	FB-SINGER-00187825	Yaron Fidler David Amsallem Amy Dunn	Will be used to prove Meta's liability, classwide impact, and damages					REL	The exhibit is relevant (see FRE 401, 402).
830	10/5/2018	Pillar Review - Potential Reach: Quip detailing ad request vs. impression issue and proposed remedy	FB-SINGER-00189104	FB-SINGER-00189121			David Amsallem	Potential Reach and Ad Impressions	Hearsay; Lack of Personal Knowledge; Foundation	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
831	5/21/2018	Email from Alex Schultz re: "Update on SUMA and Next Steps"	FB-SINGER-00217887	FB-SINGER-00217891			Alex Schultz	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models				
832		MLHP Launch to Ads Apr. 2018	FB-SINGER-00226533	FB-SINGER-00226545			Steven Tadelis; Yaron Fidler	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models				
833		SUMA Model Evaluation for ads	FB-SINGER-00226635	FB-SINGER-00226645			Steven Tadelis; Yaron Fidler; David Amsallem David Amsallem	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models				

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
834		Machine Learning Home Prediction Rollout for Ads in India	FB-SINGER-00226776	FB-SINGER-00226781			Steven Tadelis; Amy Dunn; David Amsallem David Amsallem	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models Expert Foundation	Hearsay; Lack of Personal Knowledge; Foundation	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
835		Delivery, Clarity, and Guidance Team's Competitive Audit	FB-SINGER-00228373	FB-SINGER-00228377	Armando Levy Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages	Daid Reibstein	Expert Foundation			H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
836	2/19/2018	Email about Reach Issue (complaining reached more than PR)	FB-SINGER-00232711	FB-SINGER-00232711			Meta	Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
837		Facebook Community Standards: Content-Related Requests	FB-SINGER-00254977	FB-SINGER-00254977			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
838		Facebook Community Standards: Part IV	FB-SINGER-00254978	FB-SINGER-00254980			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
839		Facebook Community Standards	FB-SINGER-00254982	FB-SINGER-00254985			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
840		Facebook Community Standards: Intellectual Property	FB-SINGER-00254986	FB-SINGER-00254986			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
841		Facebook Community Standards: Safety	FB-SINGER-00254987	FB-SINGER-00254990			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
842		Facebook Community Standards: Violence and Criminal Behavior	FB-SINGER-00254991	FB-SINGER-00254992			Meta	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
843		Hacked and Fake Accounts	FB-SINGER-00254993	FB-SINGER-00255002			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
844		About Our Policies	FB-SINGER-00255003	FB-SINGER-00255012			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to disclosures and unclean hands (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
847	4/13/2020	Screenshot of Ads Manager with help page for "Choose the Right Ad Objective"	FB-SINGER-00255015	FB-SINGER-00255017	Cain Maxwell Dan Ziernicki	Will be used to prove Meta's liability, classwide impact, and damages	David Reibstein	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models			F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
868	9/25/2017	Email chain between Facebook employees "Re: Accounting for Multiple Accounts on Instagram"	FB-SINGER-00255393	FB-SINGER-00255396	Rob Goldman Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
870	12/21/2018	Email chain between Visha Gupta, Mary Ku, and Rahul Bhandari "Re: ads reach estimator, targeting, etc"	FB-SINGER-00264321		Charles Cowan Yaron Fidler	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
871		City Home Prediction Central xfn review	FB-SINGER-00265677	FB-SINGER-00265946			Catherine Tucker; Steven Tadelis Steve Delucia	Expert Foundation; Relevant to Good Faith; Relevant to Meta's Estimates, Metrics, and Models Expert Foundation	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
872	10/25/2016	Email between Facebook employees with subject "Instagram Executive Summary October 22, 2016 "	FB-SINGER-00272318	FB-SINGER-00272328	Armando Levy Rob Goldman	Will be used to prove Meta's liability, classwide impact, and damages					REL; PREJ	Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
873	8/25/2018	David Sasaki Email re Central Product Reviews	FB-SINGER-00278871	FB-SINGER-00278871			Catherine Tucker; Alex Schultz; Rob Goldman; Rahul Bhandari	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to expert foundation, good faith, to explain Meta's estimates, metrics, and models, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
874		City Home Prediction System Understand	FB-SINGER-00292236	FB-SINGER-00292359			Catherine Tucker; Steven Tadelis Steve Delucia	Expert Foundation; Relevant to Good Faith; Relevant to Meta's Estimates, Metrics, and Models Expert Foundation	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
875	12/14/2018	Veronika Belokhvostova Email re COmmunity Integrity Analytics	FB-SINGER-00297714	FB-SINGER-00297720			Steven Tadelis; Alex Schultz	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Prejudicial, Confusing; Relevancy	Relevant to expert foundation, good faith, to explain Meta's estimates, metrics, and models, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
877	8/6/2018	Email from Mike Krieger to Instagram HPM with subject "Instagram HPM August 6"	FB-SINGER-00300058	FB-SINGER-00300062	Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					F, REL; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). MIL is opposed. Admissible under FRE 703 and 705.
878	12/6/2017	DZ Reserve email re Follow up Facebook Marketing Expert	FB-SINGER-00302722	FB-SINGER-00302724			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
879	12/7/2017	Dan Ziernicki email re A Message from Facebook	FB-SINGER-00302733	FB-SINGER-00302733			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
880	12/28/2017	DZ Reserve email re Facebook Marketing Expert Update: Transition to Longterm Support	FB-SINGER-00302734	FB-SINGER-00302735			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
881	12/21/2017	DZ Reserve email re: Email/Evidence Sent	FB-SINGER-00302739	FB-SINGER-00302739			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
882	12/7/2017	Dan Ziernicki email re A Message from Facebook	FB-SINGER-00302800	FB-SINGER-00302800			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
883	12/7/2017	Dan Ziernicki email re Policy Disabled Ad Account Help	FB-SINGER-00302802	FB-SINGER-00302803			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
884	4/5/2018	DZ Reserve email re Dumb Dumb	FB-SINGER-00302825	FB-SINGER-00302825			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
885	12/7/2017	Dan Ziernicki email re A Message from Facebook	FB-SINGER-00302851	FB-SINGER-00302851			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
886	12/7/2017	DZ Reserve email re: Ad Account Disabled for Policy Violation	FB-SINGER-00302852	FB-SINGER-00302852			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
894	12/5/2017	Presentation produced by Facebook titled "SUMA CGC Update"	FB-SINGER-00314173	FB-SINGER-00314215	Alex Schultz Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					F, REL; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). MIL is opposed.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
896	7/9/2018	Presentation produced by Facebook titled "Facebook Growth"	FB-SINGER-00315234		Charles Cowan Steven Tadelis	Will be used to prove Meta's liability, classwide impact, and damages					F; H; REL; PREI; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). MIL is opposed. Admissible under FRE 703 and 705.
897		About Facebook Pixel	FB-SINGER-00330549	FB-SINGER-00330549			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
898		About the Conversions Objective	FB-SINGER-00330550	FB-SINGER-00330550			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
899		Conversions	FB-SINGER-00330551	FB-SINGER-00330551			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
900		Create and Install a Facebook Pixel	FB-SINGER-00330552	FB-SINGER-00330553			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
901		How Customer Feedback and Low-quality Purchase Experiences Can Impact your Ad Performance and Ability to Run Ads	FB-SINGER-00330554	FB-SINGER-00330555			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
902		Use Conversion Tracking to Measure Results	FB-SINGER-00330556	FB-SINGER-00330556			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
903	3/4/2019	Email chain with subject "Ad Questions [Job: 2238862086171555]"	FB-SINGER-00366902	FB-SINGER-00366907	Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL; PREI	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
904		emails about client support	FB-SINGER-00367918	FB-SINGER-00367920			Steven Tadelis	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Prejudicial, Confusing; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to good faith and Meta's estimates, metrics and models, which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
905	8/6/2019	Email chain with subject "RE: Your Facebook Advertising Support Request [ref: ODOAOK9kF. 50012SwwEq:ref]"	FB-SINGER-00404904	FB-SINGER-00404924	Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
906	12/8/2015	Email chain with subject (RE: Set up a call with your Facebook Marketing Expert [ref:OOQDAQK9kF. 50012Vol2x:ref]	FB-SINGER-00413124		Dan Ziemicki Cain Maxwell	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
907	10/2/2020	Data file produced by Facebook with file name "dalquery-947813649047451-1023680678082634-2020-09-24-9_15pm.csv"	FB-SINGER-00424703		Dan Ziemicki Catherine Tucker	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Advertiser Behavior; Relevant to Lack of Reliance; Relevant to Damages	Prejudicial, Confusing, Relevancy	Relevant to Plaintiff's behavior, unclean hands, advertiser behavior, lack of reliance, and damages (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).	F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
908		Outcome prediction	FB-SINGER-00424706	FB-SINGER-00424716			Steven Tadelis	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
909	8/20/2020	"table_client_2.csv"	FB-SINGER-00426295		Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Not sure - data here is from custodian Facebook Catherine Tucker	Explain Meta's Estimates, Metrics, and Models Expert Foundation			F; REL; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). MIL is opposed. Admissible under FRE 703 and 705.
910		Wiki Lightweight Interfaces	FB-SINGER-00426334	FB-SINGER-00426336			Meta	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction; Relevant to Advertiser Behavior	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
911	9/21/2020	Document titled "Fake Account Index," dated September 21, 2020	FB-SINGER-00426348				Meta	Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
913		Head advertisers cheat sheet	FB-SINGER-00426499	FB-SINGER-00426512			Catherine Tucker	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
914		Torso advertisers cheat sheet	FB-SINGER-00426529	FB-SINGER-00426542			Catherine Tucker	Expert Foundation; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
916		Colorado Secretary of State Trade Name Registration showing Gift Wows is registered to BlueLight Enterprises LLC	FB-SINGER-00426548				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiffs' behavior and lack of reliance (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
917		Colorado Secretary of State Trade Name Registration showing World Gift Deals is registered to GreenLight Enterprises LLC	FB-SINGER-00426550				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiffs' behavior and lack of reliance (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
918		Black Hat World forum posts	FB-SINGER-00426556	FB-SINGER-00426564			Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior and lack of reliance (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
919		Black Hat World forum posts	FB-SINGER-00426565	FB-SINGER-00426573			Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to Plaintiffs' behavior and lack of reliance (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
920		Black Hat World forum posts	FB-SINGER-00426574	FB-SINGER-00426583			Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to Plaintiffs' behavior and lack of reliance (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
921		Black Hat World forum posts	FB-SINGER-00426584	FB-SINGER-00426590			Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to Plaintiffs' behavior and lack of reliance (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
922		Black Hat World forum posts	FB-SINGER-00426594	FB-SINGER-00426597			Ziernicki	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Lack of Reliance; Relevant to Damages; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to Plaintiffs' behavior and lack of reliance (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
923		Native .csv file with page_id, page_name, admin_user_id, and admin_name information	FB-SINGER-00426629				DZ, Tadelis	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance, Relevant to Damages	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiffs' behavior, unclean hands, and lack of reliance (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
924		Miles Dobbyn Business Ids	FB-SINGER-00426630	FB-SINGER-00426630			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, lack of reliance, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
925		DZ Reserve Accounts and Pages	FB-SINGER-00426636	FB-SINGER-00426636			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Lack of Personal Knowledge	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
926		DZ Reserve Accounts Disabled	FB-SINGER-00426637	FB-SINGER-00426637			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, lack of reliance, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
927		DZ Reserve Ads Rejected	FB-SINGER-00426638	FB-SINGER-00426638			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, lack of reliance, unclean hands, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
961		AM Results - 1.JPG	FB-SINGER-00426888	FB-SINGER-00426888			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Prejudicial, Confusing; Relevancy	Relevant to disclosures, good faith, and Meta's estimates, metrics and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
962		AM Results - 2.JPG	FB-SINGER-00426889	FB-SINGER-00426889			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Prejudicial, Confusing; Relevancy	Relevant to disclosures, good faith, and Meta's estimates, metrics and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
963		AM Results - 3.JPG	FB-SINGER-00426890	FB-SINGER-00426890			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Prejudicial, Confusing; Relevancy	Relevant to disclosures, good faith, and Meta's estimates, metrics and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
964		AM Results - 4.JPG	FB-SINGER-00426891	FB-SINGER-00426891			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Prejudicial, Confusing; Relevancy	Relevant to disclosures, good faith, and Meta's estimates, metrics and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
965		AM Results - 5.JPG	FB-SINGER-00426892	FB-SINGER-00426892			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Prejudicial, Confusing; Relevancy	Relevant to disclosures, good faith, and Meta's estimates, metrics and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
966		AM Results - 6.JPG	FB-SINGER-00426893	FB-SINGER-00426893			Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Prejudicial, Confusing; Relevancy	Relevant to disclosures, good faith, and Meta's estimates, metrics and models (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
967	Unknown	Source code file	FB-SINGER-SC-000104	FB-SINGER-SC-000107	Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
968	4/3/2019	C. Maxwell chat with Facebook Support	MAXWELL_00000246	MAXWELL_00000246			Cain Maxwell	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
969		user-archive-LittleBrotherMax-190820-193358-117.csv	MAXWELL_00000748	MAXWELL_00000749			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
970		Cain Maxwell data file	MAXWELL_00000749	MAXWELL_00000749			Cain Maxwell; Catherine Tucker	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Expert Foundation	Foundation; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to plaintiff's behavior, lack of reliance, expert foundation, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
971		Ad Sets_export_20190821_1526.csv	MAXWELL_00000757	MAXWELL_00000759			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
972	8/21/2019	Cain Maxwell Ads_export_20190821_1531	MAXWELL_00000758	MAXWELL_00000758			Cain Maxwell; Catherine Tucker	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Expert Foundation	Relevancy	Relevant to plaintiff's behavior, lack of reliance, expert foundation, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
973	8/21/2019	Cain Maxwell Campaigns_export_20190821_1424	MAXWELL_00000759	MAXWELL_00000759			Cain Maxwell; Catherine Tucker	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Expert Foundation	Relevancy	Relevant to plaintiff's behavior, lack of reliance, expert foundation, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
974	9/18/2018	C. Maxwell post on Amazing.com forum	MAXWELL_00000805	MAXWELL_00000805			Cain Maxwell	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
975		Max-Martialis-Ad-Sets-Lifetime.xlsx	MAXWELL_00000822	MAXWELL_00000828			Cain Maxwell; Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
976		C. Maxwell Targeting details	MAXWELL_00000823	MAXWELL_00000823			Cain Maxwell	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Relevancy	Relevant to plaintiff's behavior, lack of reliance, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
977		Cain Maxwell By Date_Detail Page Sales and Traffic_By Week_BusinessReport	MAXWELL_00000825	MAXWELL_00000825			Cain Maxwell; Catherine Tucker	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Expert Foundation	Relevancy	Relevant to plaintiff's behavior, lack of reliance, expert foundation, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
978		Geographic location report.csv	MAXWELL_00000833	MAXWELL_00000833			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
979		Targeted location report.csv	MAXWELL_00000835	MAXWELL_00000835			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
980		User location report.csv	MAXWELL_00000837	MAXWELL_00000837			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
981		Ad schedule day and hour report.csv	MAXWELL_00000844	MAXWELL_00000844			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
982		Ad schedule day report.csv	MAXWELL_00000882	MAXWELL_00000882			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
983		Ad schedule hour report.csv	MAXWELL_00000885	MAXWELL_00000885			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
984		Device report.csv	MAXWELL_00000892	MAXWELL_00000892			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
985		1Advanced bid adjustment report.csv	MAXWELL_00000896	MAXWELL_00000896			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
987		Campaign auction insight report.csv	MAXWELL_00000919	MAXWELL_00000919			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
989		Ad group auction insight report.csv	MAXWELL_00000926	MAXWELL_00000926			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
990		Ad group report.csv	MAXWELL_00000928	MAXWELL_00000928			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
991		Ad report.csv	MAXWELL_00000930	MAXWELL_00000930			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
992		Automated extension report.csv	MAXWELL_00000934	MAXWELL_00000934			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
993		Expanded landing page report.csv	MAXWELL_00000937	MAXWELL_00000937			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
994		5Landing page report.csv	MAXWELL_00000940	MAXWELL_00000940			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
995		Keyword auction insight report.csv	MAXWELL_00000943	MAXWELL_00000943			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
996		Search keyword report.csv	MAXWELL_00000947	MAXWELL_00000947			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
997		Search terms report.csv	MAXWELL_00000952	MAXWELL_00000952			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
998		Age report.csv	MAXWELL_00000977	MAXWELL_00000977			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
999		Combination report.csv	MAXWELL_00000980	MAXWELL_00000980			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
1000		Gender report.csv	MAXWELL_00001092	MAXWELL_00001092			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
1001		Household income report.csv	MAXWELL_00001095	MAXWELL_00001095			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
1002		Automatic placements report.csv	MAXWELL_00001098	MAXWELL_00001098			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
1003		Managed placements report.csv	MAXWELL_00001100	MAXWELL_00001100			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1004		By ASIN_Detail Page Sales and Traffic_BusinessReport.csv	MAXWELL_00001104	MAXWELL_00001105			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Relevancy	Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
1005		Cain Maxwell By Date_Detail Page Sales and Traffic_By Month_BusinessReport	MAXWELL_00001105	MAXWELL_00001105			Cain Maxwell; Catherine Tucker	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Expert Foundation	Relevancy	Relevant to plaintiff's behavior, lack of reliance, expert foundation, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1008		Campaign settings.pdf	MAXWELL_00001321	MAXWELL_00001470			Catherine Tucker	Expert Foundation; Relevant to Plaintiffs' Behavior; Relevant to Advertiser's Behavior	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to Plaintiff's behavior and advertiser behavior (see FRE 401, 402).		
1009	7/27/2020	Cain Maxwell - Amazon Advertising	MAXWELL_00001323	MAXWELL_00001323			Cain Maxwell	Relevant to Plaintiff's Behavior	Authenticity; Foundation	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1010	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_negative_keywords_Jul_27_2020	MAXWELL_00001324	MAXWELL_00001324			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1011	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_placements_Jul_27_2020	MAXWELL_00001325	MAXWELL_00001325			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1012	7/27/2020	Cain Maxwell Manual Gun Magnetic Campaign Settings	MAXWELL_00001326	MAXWELL_00001327			Cain Maxwell	Relevant to Plaintiff's Behavior	Authenticity; Foundation; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1013	7/27/2020	Cain Maxwell - Amazon Advertising	MAXWELL_00001328	MAXWELL_00001328			Cain Maxwell	Relevant to Plaintiff's Behavior	Authenticity; Foundation; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1014	7/27/2020	Cain Maxwell Sponsored_Products_campaign_negative_keywords_Jul_27_202	MAXWELL_00001329	MAXWELL_00001329			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1015	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_placements_Jul_27_2020	MAXWELL_00001330	MAXWELL_00001330			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1016	7/27/2020	Cain Maxwell Manual Gun Magnetic Campaign Settings	MAXWELL_00001331	MAXWELL_00001332			Cain Maxwell	Relevant to Plaintiff's Behavior	Authenticity; Foundation; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1017	7/27/2020	Cain Maxwell Manual Gun Magnetic Campaign Settings	MAXWELL_00001333	MAXWELL_00001333			Cain Maxwell	Relevant to Plaintiff's Behavior	Prejudicial, Confusing; Relevancy	Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1018	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_adgroups_Jul_27_2020	MAXWELL_00001334	MAXWELL_00001334			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1019	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_negative_keywords_Jul_27_2020	MAXWELL_00001335	MAXWELL_00001335			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1020	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_placements_Jul_27_2020	MAXWELL_00001336	MAXWELL_00001336			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1021	7/27/2020	Cain Maxwell Magnetic Gun Mount Campaign Settings	MAXWELL_00001337	MAXWELL_00001338			Cain Maxwell	Relevant to Plaintiff's Behavior	Authenticity; Foundation; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1022	7/27/2020	Cain Maxwell Magnetic Gun Mount Campaign Settings	MAXWELL_00001339	MAXWELL_00001339			Cain Maxwell	Relevant to Plaintiff's Behavior	Authenticity; Foundation; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1023	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_adgroups_Jul_27_2020	MAXWELL_00001340	MAXWELL_00001340			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1024	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_negative_keywords_Jul_27_2020	MAXWELL_00001341	MAXWELL_00001341			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1025	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_placements_Jul_27_2020	MAXWELL_00001342	MAXWELL_00001342			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Relevant to plaintiff's behavior, background, witness credibility, and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1026	7/27/2020	Cain Maxwell Magnetic Gun Mount Manual Campaign Settings	MAXWELL_00001343	MAXWELL_00001344			Cain Maxwell	Relevant to Plaintiff's Behavior	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1027	7/27/2020	Cain Maxwell Magnetic Gun Mount Manual Campaign Settings	MAXWELL_00001345	MAXWELL_00001345			Cain Maxwell	Relevant to Plaintiff's Behavior	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1028	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_adgroups_Jul_27_2020	MAXWELL_00001346	MAXWELL_00001346			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1029	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_negative_keywords_Jul_27_2020	MAXWELL_00001347	MAXWELL_00001347			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1030	7/27/2020	Cain Maxwell - Sponsored_Products_campaign_placements_Jul_27_2020	MAXWELL_00001348	MAXWELL_00001348			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1031		Max Martalis Amazon Advertising Statistics	MAXWELL_00001349	MAXWELL_00001350			Cain Maxwell	Relevant to Plaintiff's Behavior	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1033	7/15/2020	Cain Maxwell - Campaigns_Jul_15_2020	MAXWELL_00001351	MAXWELL_00001351			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1034	7/28/2020	Cain Maxwell - Sponsored_Products_campaign_adgroups_Jul_28_2020 - AGML	MAXWELL_00001352	MAXWELL_00001352			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1035	7/28/2020	Cain Maxwell - Sponsored_Products_campaign_adgroups_Jul_28_2020 - MGMC	MAXWELL_00001353	MAXWELL_00001353			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402).		
1036	8/31/2018	Aug 1, 2018 - Aug 31, 2018 Sponsored Products Search term report	MAXWELL_00001354	MAXWELL_00001354			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1037	8/31/2018	Aug. 1, 2018 - Aug. 31, 2018 Sponsored Products Search term report	MAXWELL_00001355	MAXWELL_00001355			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1038	8/14/2018	Aug. 15, 2018 - Oct. 14, 2018 Sponsored Products Search term report	MAXWELL_00001356	MAXWELL_00001356			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1039	1/6/2019	Dec 23, 2018 - Jan 6, 2019 Sponsored Products Search term report	MAXWELL_00001357	MAXWELL_00001357			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1040	12/31/2018	Dec. 1, 2018 - Dec. 31, 2018 Sponsored Products Search term report	MAXWELL_00001358	MAXWELL_00001358			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1041	12/23/2018	Dec. 16, 2018 - Dec. 23, 2018 Sponsored Products Search term report	MAXWELL_00001359	MAXWELL_00001359			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1042	12/30/2018	Dec. 16, 2018 - Dec. 30, 2018 Sponsored Products Search term report	MAXWELL_00001360	MAXWELL_00001360			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1043	1/6/2019	Dec. 23, 2018 - Jan. 6, 2019 Sponsored Products Search term report	MAXWELL_00001361	MAXWELL_00001361			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1044	1/13/2019	Dec. 30, 2018 - Jan. 13, 2019 Sponsored Products Search term report	MAXWELL_00001362	MAXWELL_00001362			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1045	12/28/2018	Dec. 9, 2018 - Dec. 28, 2018 Sponsored Products Search term report	MAXWELL_00001363	MAXWELL_00001363			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1046	2/28/2019	Feb. 1, 2019 - Feb. 28, 2019 Sponsored Products Search term report	MAXWELL_00001364	MAXWELL_00001364			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1047	1/27/2019	Jan. 13, 2019 - Jan. 27, 2019 Sponsored Products Search term report	MAXWELL_00001365	MAXWELL_00001365			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1048	2/3/2019	Jan. 20, 2019 - Feb. 3, 2019 Sponsored Products Search term report	MAXWELL_00001366	MAXWELL_00001366			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1049	11/30/2018	Nov. 1, 2018 - Nov. 30, 2018 Sponsored Products Search term report	MAXWELL_00001367	MAXWELL_00001367			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1050	11/10/2018	Nov. 4, 2018 - Nov. 10, 2018 Sponsored Products Search term report.	MAXWELL_00001368	MAXWELL_00001368			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1051	10/31/2018	Oct. 1, 2018 - Oct. 31, 2018 Sponsored Products Search term report	MAXWELL_00001369	MAXWELL_00001369			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1052	9/30/2018	Sept. 1, 2018 - Sept. 30, 2018 Sponsored Products Search term report	MAXWELL_00001370	MAXWELL_00001370			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1053	9/12/2018	Sept. 12, 2018 - Sept. 12, 2018 Sponsored Products Keyword report	MAXWELL_00001371	MAXWELL_00001371			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1054	9/16/2018	Sept. 16, 2018 - Sept. 16, 2018 Sponsored Products Search term report	MAXWELL_00001372	MAXWELL_00001372			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1055	9/27/2018	Sept. 27, 2018 - Sept. 27, 2018 Sponsored Products Search term repor	MAXWELL_00001373	MAXWELL_00001373			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1056		Max-Martialis-Ad-Sets-Lifetime	MAXWELL_00001374	MAXWELL_00001374			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1057		Max-Martialis-Ad-Sets-Lifetime	MAXWELL_00001375	MAXWELL_00001375			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1058		Max-Martialis-Campaigns-Lifetime	MAXWELL_00001376	MAXWELL_00001376			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1069	2/28/2019	Customer Shipment Sales report 1.31.19 - 2.28.19	MAXWELL_00001411	MAXWELL_00001411			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1070	3/31/2019	Customer Shipment Sales report 3.1.19 - 3.31.19.	MAXWELL_00001412	MAXWELL_00001412			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1071	4/30/2019	Customer Shipment Sales report 4.1.19 - 4.30.19	MAXWELL_00001413	MAXWELL_00001413			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1072	1/31/2019	Promotions report 1.1.19 - 1.31.19	MAXWELL_00001414	MAXWELL_00001414			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1073	10/31/2018	Promotions report 10.1.18 - 10.31.18	MAXWELL_00001415	MAXWELL_00001415			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1074	11/30/2018	Promotions report 11.1.18 - 11.30.18	MAXWELL_00001416	MAXWELL_00001416			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1075	12/31/2018	Promotions report 12.1.18 - 12.31.18	MAXWELL_00001417	MAXWELL_00001417			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1076	4/30/2019	Promotions report 4.1.19 - 4.30.19	MAXWELL_00001418	MAXWELL_00001418			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiffs Behavior and to cross examine a Plaintiff and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1077	8/31/2018	Promotions report 8.1.18 - 8.31.18	MAXWELL_00001419	MAXWELL_00001419			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1078	9/30/2018	Promotions report 9.1.18 - 9.30.18	MAXWELL_00001420	MAXWELL_00001420			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1079	1/31/2019	2019.01 - FBA customer returns	MAXWELL_00001421	MAXWELL_00001421			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1081	2/28/2019	2019.02 - FBA customer returns	MAXWELL_00001422	MAXWELL_00001422			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1082	5/10/2019	Transaction view report - October 1, 2018 - May 10, 2019	MAXWELL_00001423	MAXWELL_00001467			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1083	2/28/2019	Fulfillment Shipment reports 1.31.19 - 2.28.19	MAXWELL_00001468	MAXWELL_00001468			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1084	3/31/2019	Fulfillment Shipment reports 3.1.19 - 3.31.1	MAXWELL_00001469	MAXWELL_00001469			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1085	4/30/2019	Fulfillment Shipment reports 4.1.19 - 4.30.19	MAXWELL_00001470	MAXWELL_00001470			Cain Maxwell	Relevant to Plaintiff's Behavior	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior and to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1086		Email attaching Publics Media: Facebook Potential Reach Discrepancy	PUB0001848	PUB0001857			Catherine Tucker	Expert Foundation	Authenticity; Foundation; Hearsay; Prejudicial, Confusing	Authenticity to be established by testimony at trial (see FRE 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to advertiser behavior (see FRE 401, 402).		
1087		Kate Sirkin and others emails about ad reach	PUB0002018	PUB0002023			Catherine Tucker	Expert Foundation	Authenticity; Foundation; Hearsay; Prejudicial, Confusing	Authenticity to be established by testimony at trial (see FRE 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert opinion on Plaintiffs' claims and Meta's defenses, which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1088		FB Support Email Regarding Disabled Ads in March 2019 Addressed to "Miles"	TP_00000024	TP_00000025			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Authenticity; Prejudicial, Confusing; Relevancy	Authenticity to be established by testimony at trial (see FRE 901, 902). Relevant to Plaintiffs' behavior, lack of reliance, and unclean hands, which outweigh any potential confusion or prejudice (see FRE 401, 403).		
1089	3/11/2019	Facebook email to Miles Dobbyn re Ad Account Disabled for Policy Violation	TP_00000091	TP_00000091			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's Behavior; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1090		FB Email to "Miles Dobbyns" Produced by Color Entities	TP_00000111	TP_00000112			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1091	3/29/2019	Facebook email to Miles Dobbyn re Ad Account Disabled for Policy Violation	TP_00000582	TP_00000582			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's Behavior; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1092	4/5/2019	Facebook email to Miles Dobbyn re Ad Account Disabled for Policy Violation	TP_00000734	TP_00000734			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's Behavior; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1093	5/13/2019	GL Enterprises email re Facebook Chat Request	TP_00000816	TP_00000817			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's Behavior; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1094	5/13/2019	GL Enterprises Email re Facebook Chat Request	TP_00001190	TP_00001192			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's Behavior; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1095		GreenLight FB Ad Purchases	TP_00001194	TP_00001194			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1096		GreenLight FB Ad Purchases	TP_00001195	TP_00001195			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1097		GreenLight FB Ad Purchases	TP_00001196	TP_00001196			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1098		GreenLight FB Ad Purchases	TP_00001197	TP_00001197			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1099		GreenLight FB Ad Purchases	TP_00001198	TP_00001198			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1100		GreenLight FB Ad Purchases	TP_00001199	TP_00001199			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1101		BlueLight FB Ad Purchases	TP_00001200				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1102		BlueLight FB Ad Purchases	TP_00001201				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1103		BlueLight FB Ad Purchases	TP_00001202				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1104		GreenLight FB Ad Purchases	TP_00001203	TP_00001203			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1105		GreenLight FB Ad Purchases	TP_00001204	TP_00001204			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1106		GreenLight FB Ad Purchases	TP_00001205	TP_00001205			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1107		GreenLight FB Ad Purchases	TP_00001206	TP_00001206			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1108		GreenLight FB Ad Purchases	TP_00001207	TP_00001207			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1109		GreenLight FB Ad Purchases	TP_00001208	TP_00001208			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1110		GreenLight FB Ad Purchases	TP_00001209	TP_00001209			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1111		GreenLight FB Ad Purchases	TP_00001210	TP_00001210			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1112		GreenLight FB Ad Purchases	TP_00001211	TP_00001211			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1113		GreenLight FB Ad Purchases	TP_00001212	TP_00001212			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1114	1/2/2020	Document produced by DZ Reserve with representative records of selected ads created between March 25, 2019, and January 2, 2020	TP_00001213	TP_00001213			Ziernicki, Experts	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance, Relevant to Damages	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior, lack of reliance, unclean hands, and damages, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1115		GreenLight FB Ad Purchases	TP_00001214	TP_00001214			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1116		GreenLight FB Ad Purchases	TP_00001215	TP_00001215			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1117		GreenLight FB Ad Purchases	TP_00001216	TP_00001216			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1118		GreenLight FB Ad Purchases	TP_00001217	TP_00001217			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1119		GreenLight FB Ad Purchases	TP_00001218	TP_00001218			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1120		GreenLight FB Ad Purchases	TP_00001219	TP_00001219			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1121		GreenLight FB Ad Purchases	TP_00001220	TP_00001220			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1122		GreenLight FB Ad Purchases	TP_00001221	TP_00001221			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1123		GreenLight FB Ad Purchases	TP_00001222	TP_00001222			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1124		GreenLight FB Ad Purchases	TP_00001223	TP_00001223			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1125		OrangeLight FB Ad Purchases	TP_00001224				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1126		OrangeLight FB Ad Purchases	TP_00001225				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1127		OrangeLight FB Ad Purchases	TP_00001226				Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1128		GreenLight FB Ad Purchases	TP_00001227	TP_00001227			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1129		GreenLight FB Ad Purchases	TP_00001228	TP_00001228			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1130		GreenLight FB Ad Purchases	TP_00001229	TP_00001229			Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance	Prejudicial, Confusing; Relevancy	Relevant to Plaintiff's behavior and lack of reliance, which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1131		"About campaign objectives in Google Ads", https://support.google.com/google-ads/answer/7450050?hl=en			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). MIL is opposed. The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1132		"About cost per action", Meta Business Help Center, https://www.facebook.com/business/help/237396169733125			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					F; REL; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). MIL is opposed. Admissible under FRE 703 and 705.
1133		"About Estimated Audience Size", Meta Business Help Center, https://www.facebook.com/business/help/1665333080167380?id=176276233019487			Larry Chlagaouris	Will be used to prove Meta's liability, classwide impact, and damages					F; REL; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). MIL is opposed. Admissible under FRE 703 and 705.
1134	2/23/2022	Article titled "About Estimated Audience Size" from the Meta Business Help Center, downloaded February 23, 2022					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to disclosures, good faith, and to explain Meta's estimates, metrics, and models, which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1135		"Advertising Agency", Marketing Dictionary, https://marketing-dictionary.org/a/advertising-agency/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1136		"Advertising Impression", Marketing Dictionary, https://marketing-dictionary.org/a/advertising-impression/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1137		"Click", Marketing Dictionary, https://marketing-dictionary.org/c/click/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1138		"Facebook Ads: How to Estimate your Investment Budget on Facebook", MyLittleBigWeb, https://mylittlebigweb.com/en/facebook-ads-how-to-estimate-your-investment-budget-onfacebook/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1139	8/27/2020	"Facebook's iOS 14 Announcement, Understanding the IDFA, The Real Showdown", Stratechery (Aug. 27, 2020), https://stratechery.com/2020/facebook-ios-14-announcement-understanding-the-idfa-the-real-showdown/			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1140	4/22/2019	"Facebook's New Metrics and Changes to Potential Reach" (April 22, 2019) https://www.marinssoftware.com/blog/facebook-s-new-metrics-and-changes-to-potential-reach			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1141		"Frequency", Marketing Dictionary, https://marketing-dictionary.org/f/frequency/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1142		"How to choose the right ad objective in Meta Ads Manager", Meta Business Help Center, https://www.facebook.com/business/help/1438417719786914			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1143		"Impression", Marketing Dictionary, https://marketing-dictionary.org/i/impression/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1144		"Lighthouse Studio: CBC", Sawtooth Software, http://www.sawtoothsoftware.com/products/choice-analysis/cbc			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1145		"Organization", Marketing Accountability Standards Board, https://themasb.org/organization/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1146		"Potential Reach", Sprout Social, https://web.archive.org/web/20200522123942/https://sproutsocial.com/glossary/potential-reach/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1147		"Reach", Marketing Dictionary, https://marketing-dictionary.org/r/reach/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1148		"Target Market", Marketing Dictionary, https://marketing-dictionary.org/t/target-market/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1149		"The CBC/HB System for Hierarchical Bayes Estimation Version 5.0 Technical Paper", http://www.sawtoothsoftware.com/support/technical-papers/hierarchical-bayes-estimation/cbc-hb-technical-paper-2009			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1150		"The MASB Story", Marketing Accountability Standards Board, https://themasb.org/the-masb-story/			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1151		"View and analyze ads results in Meta Ads Manager", Meta Business Help Center, https://www.facebook.com/business/help/318580098318734?id=369013183583436			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1152		"Facebook Expansion Enables More People to Connect with Friends in a Trusted Environment." About Facebook, September 26, 2006. https://about.fb.com/news/2006/09/facebook-expansion-enables-more-people-to-connect-with-friends-in-a-trusted-environment/			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					F; REL; MIL	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). MIL is opposed. Admissible under FRE 703 and 705.
1154		"Lightning Strike Victim Data." Centers for Disease Control and Prevention, available at: https://www.cdc.gov/lightning/data-research/?CDC_AAref_Val=https://www.cdc.gov/disasters/lightning/victimdata.html			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1155		All source code files reviewed by or relied upon by Dr. Atif Hashmi			Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1156	8/6/2020	Allenby Pre-Test Interview #1			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1157	8/7/2020	Allenby Pre-Test Interview #10			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1158	8/8/2020	Allenby Pre-Test Interview #11			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1159	8/9/2020	Allenby Pre-Test Interview #12			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1160	8/10/2020	Allenby Pre-Test Interview #2			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1161	8/11/2020	Allenby Pre-Test Interview #3			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1162	8/12/2020	Allenby Pre-Test Interview #4			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1163	8/13/2020	Allenby Pre-Test Interview #5			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1164	8/14/2020	Allenby Pre-Test Interview #6			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1165	8/15/2020	Allenby Pre-Test Interview #7			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1166	8/16/2020	Allenby Pre-Test Interview #8			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1167	8/17/2020	Allenby Pre-Test Interview #9			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1168		Allenby Survey, http://qa.interceptsurveys.net/Survey2389/index.aspx			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1169		Allenby, Greg M. and James L. Ginter (1995) "Using Extremes to Design Products and Segment Markets," Journal of Marketing Research			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1170		Allenby, Greg M. and Jeff D. Brazell (2016) "Decision-Based Analytics for Marketing's Toughest Problems," Seven Summits of Marketing Research			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages	David Reibstein	Expert Foundation			H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1171		Allenby, Greg M. and Peter E. Rossi (1999) "Marketing Models of Consumer Heterogeneity," Journal of Econometrics			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1172		Allenby, Greg M. and Peter E. Rossi (2003) "Perspectives Based on 10 Years of HB in Marketing Research," Sawtooth Software Research Paper Series.			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1173		Allenby, Greg M., Jeff D. Brazell, John R. Howell and Peter E. Rossi (2014) "Economic Valuation of Product Features," Quantitative Marketing and Economics, 12, 421-456			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages	David Reibstein	Expert Foundation			H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1174		Allenby, Greg M., Jeff D. Brazell, John R. Howell and Peter E. Rossi (2014) "Valuation of Patented Product Features," Journal of Law and Economics, 57, 3, 629-663, section 3.3, 32, 152-162, Section 6.			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages	David Reibstein	Expert Foundation			H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1175		Allenby, Greg M., Nino Hardt and Peter E. Rossi (2019) "Economic Foundations of Conjoint Analysis," In Handbook of the Economics of Marketing, JP Dube and Peter Rossi, editors, Elsevier. 151-192			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1176		Amazon's Form 10-K for 2012			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1177		Amazon's Form 10-K for 2013			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1178		Amazon's Form 10-K for 2014			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1179		Amazon's Form 10-K for 2015			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1180		Amazon's Form 10-K for 2016			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1181		Amazon's Form 10-K for 2017			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1182		Amazon's Form 10-K for 2018			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1183		Ambrus, A., Calvano, E. and Reisinger, M. (2016) "Either or Both Competition: A "Two-Sided" Theory of Advertising with Overlapping Viewerships" American Economic Journal: Microeconomics, Vol. 8(3): 189-222			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1184		Arrington, Michael. "Facebook Goes Mobile." TechCrunch. TechCrunch, January 10, 2007.			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1185		Athey, S., Calvano, E. and Gans, J.S. (2018) "The Impact of Consumer Multi-homing on Advertising Markets and Media Competition" Management Science, Vol. 64(4): 1574-1590			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1186		Babin, Barry J. and William G. Zikmund (2016) Exploring Marketing Research, 11th ed., Cengage Learning, Boston, MA. p.274-275			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1187		Berry, S. Levinsohn, J. and Pakes, A. (1995) "Automobile Prices in Market Equilibrium" Econometrica, Vol. 63(4): 841-890			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1188		Box, George E. P., William G. Hunter and J. Stuart Hunter (1978) Statistics for Experimenters, John Wiley & Sons, Inc.			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1189		Brittany Shammass and Lena H. Sun, "How the Sturgis Motorcycle Rally may have spread coronavirus across the Upper Midwest." Washington Post, October 17, 2020. Available at: https://www.washingtonpost.com/health/2020/10/17/sturgis-rally-spread/			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1190		Campaign Monitor, "How to Get Your Return on Investment from Online Advertising", https://www.campaignmonitor.com/resources/knowledge-base/how-to-get-your-return-on-investment-from-online-advertising/			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1191		Christopher Ingraham, "Map: The coronavirus risk for a big Thanksgiving dinner in your community." Washington Post, November. 18, 2020. Available at: https://www.washingtonpost.com/business/2020/11/18/map-covid-risk-thanksgiving/			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
1192		Congressional Staff Report (2020) "Investigation of Competition in Digital Markets"			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1193		COVID-19 Event Risk Assessment Planning Tool, available at https://covid19risk.biosci.gatech.edu			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1194		D'Annunzio, A. and Russo, A. (2020) "Ad Networks and Consumer Tracking" Management Science, Vol. 66(11): 5040-5058			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1195		Diamond, Shari S. (2011) "Reference Guide on Survey Research," in Reference Manual on Scientific Evidence, Third Edition, Federal Judicial Center, pp. 359-423.			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1196		Don Dickinson and Craig Davis, Media Strategy & Planning Workbook: How to Create a Comprehensive Media Plan, Melvin & Leigh: Irvine, California, 3rd edition, 2021			Larry Chlagnouris	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1197		Dotson, Jeffrey P. John R. Howell, Jeff D. Brazell, Thomas Otter, Peter J. Lenk, Steve MacEachern and Greg M. Allenby (2018) "A Probit Model with Structured Covariance for Similarity Effects and Source of Volume Calculations," Journal of Marketing Research, 55, 35-47.			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages	David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1198		Dughmi, Shaddin, Roughgarden, T. and Yan, Q. (2016). "Optimal Mechanisms for Combinatorial Auctions and Combinatorial Public Projects via Convex Rounding," Journal of the ACM, 63(4): Article 30, September 2016.			Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1199		Edelman, B., Ostrovsky, M. and Schwarz, M. (2007) "Internet Advertising and the Generalized Second-Price Auction: Selling Billions of Dollars Worth of Keywords" American Economic Review, Vol. 97(1): 242-259			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1200		Exhibits and Appendices to Expert Reply Report of Dr. Atif Hashmi			Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1201		Exhibits and Appendices to Expert Reply Report of Dr. Greg Allenby			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1202		Exhibits and Appendices to Expert Report of Armando Levy, Ph.D			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1203		Exhibits and Appendices to Expert Report of Dr. Atif Hashmi			Atif Hashmi	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1204		Exhibits and Appendices to Expert Report of Dr. Greg Allenby			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1205		Exhibits and Appendices to Expert Reply Report of Charles D. Cowan, PhD			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1206		Exhibits and Appendices to Expert Report of Charles D. Cowan, PhD			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1207		Exhibits and Appendices to Expert Report of Dr. Larry Chiagouris			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1208		Exhibits and Appendices to Expert Report of Dr. Timothy Roughgarden			Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1209		Exhibits and Appendices to Expert Reply Report of Armando Levy, Ph.D			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1210		Facebook Q4 2019 Results, at https://s21.q4cdn.com/399680738/files/doc_financials/2019/q4/Q4-2019-Earnings-Presentation-final.pdf			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1211		Frost, J. "Failing to Reject the Null Hypothesis", https://statisticsbyjim.com/hypothesis-testing/failing-reject-null-hypothesis			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1212		FTC Sues Facebook for Illegal Monopolization, 12/9/2020, https://www.ftc.gov/news-events/news/press-releases/2020/12/ftc-sues-facebook-illegal-monopolization			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1213		Gelfand, A. and Smith, A. (1990) "Sampling Based Approaches to Calculating Marginal Densities," <i>Journal of the American Statistical Association</i> , 85, 398-409			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.

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1214		George Marsaglia (April 1964). "Ratios of Normal Variables and Ratios of Sums of Uniform Variables." Boeing Scientific Research Laboratories, available at: https://apps.dtic.mil/sti/tr/pdf/AD0600972.pdf			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1215		Google's Form 10-K for 2012			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1216		Google's Form 10-K for 2013			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1217		Google's Form 10-K for 2014			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1218		Google's Form 10-K for 2015			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1219		Google's Form 10-K for 2016			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1220		Google's Form 10-K for 2017			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1221		Google's Form 10-K for 2018			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1222		Gordon, B.R., Kinshuk, J., Katona, Z., Narayanan, S., Shin, J. and Wilbur, K.C. (2020) "Inefficiencies in Digital Advertising Markets" Working Paper			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1223		"Strategy," Nanigans, available at https://www.nanigans.com/solutions/strategy/ (accessed on February 15, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1224		Green Paul E., A. M. Krieger and T. Vavra (1999), "Evaluating EZ-Pass: Using Conjoint Analysis to Assess Consumer Response to a New Tollway Technology," Marketing Research, Vol. (Summer), 5-16.			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1225		Greenfield, Rebecca. "2012: The Year Facebook Finally Tried to Make Some Money," October 30, 2013.			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1226		Hauser, John R. And Vithala Rao (2004), "Conjoint Analysis, Related Modeling, and Applications," Advances in Marketing Research: Progress and Prospects, Jerry Wind and Paul Green, Eds., (Boston, MA: Kluwer Academic Publishers), pp.141-168.			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.
1227		Hinkley, D. (1969). "On the Ratio of Two Correlated Normal Random Variables." Biometrika. 56(3), 635-639. doi:10.2307/2334671, available at: http://static.steereads.com/papers/to read/on the ratio of two correlated normal random variables.pdf			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; D; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document. Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1228		"What is Conjoint Analysis," Sawtooth Software, available at https://sawtoothsoftware.com/conjoint-analysis (viewed March 1, 2021);					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1229		"About Ad Auctions," Facebook for Business, https://www.facebook.com/business/help/430291176997542 (viewed Jan. 28, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1230		"About Budgets," Facebook for Business, November 12, 2020, available at: https://www.facebook.com/business/help/214319341922580?d=629338044106215 , (accessed on December 15, 2020).					Catherine Tucker	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1231		"About Estimated Daily Results," Facebook for Business, https://www.facebook.com/business/help/1438142206453359 (viewed Feb. 24, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1232		"About Optimizing for Ad Delivery," Facebook for Business, https://www.facebook.com/business/help/355670007911605 (viewed Jan. 28, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1233		Horton, Nicholas J.; Kleinman, Ken P. (2007-02-01). "Much ado about nothing: A comparison of missing data methods and software to fit incomplete data regression models". The American Statistician. 61 (1): 79-90, available at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1839993/			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1234		Howell, John R., Sanghak Lee and Greg M. Allenby (2016) "Price Promotions in Choice Models," Marketing Science, 35, 319-334			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages	David Reibstein	Expert Foundation		Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).	H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1235		http://video.mit.edu/watch/courtyard-by-marriott-1988-finalist-5861/			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1236		"About Placements in Ads Manager." Facebook for Business, November 11, 2020. https://www.facebook.com/business/help/407108559393196 (viewed Feb. 24, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1237		https://marketing-dictionary.org/a/advertiser/			Larry Chlaigouris	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1238		Huber, J. (2004) "Conjoint Analysis: How We Got Here and Where We Are (An Update)", Sawtooth Software Research Paper Series http://www.sawtoothsoftware.com/support/technical-papers/general-conjoint-analysis/conjoint-analysis-how-we-got-here-and-where-we-are-an-update-2004			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1239		Ivaldi, M. and Zhang, J. (2017) "Advertising Competition in the Free-to-Air TV Broadcasting Industry", CESifo Working Paper, No. 6461, Center for Economic Studies and ifo Institute (CESifo), Munich, https://www.econstor.eu/bitstream/10419/161900/1/cesifo1_wp6461.pdf			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1240		Ivaldi, M. and Zhang, J. (2018) "Advertising Competition in the Free-to-Air TV Broadcast Industry" Working Paper No. 15-578 Toulouse School of Economics, https://www.tse-fr.eu/sites/default/files/TSE/documents/doc/wp/2015/wp_tse_578.pdf			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1241		Ives, Nat (2020) "Where Advertisers Boycotting Facebook Are Spending Their Money Instead" Wall Street Journal, June 29, 2020 [https://www.wsj.com/articles/where-advertisers-boycotting-facebook-are-spending-their-money-instead-11593467895]			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1242		Jack Hayya, Donald Armstrong, Nicolas Gressis, (1975). "A Note on the Ratio of Two Normally Distributed Variables." Management Science 21(11):1338-1341, available at: https://pubsonline.informs.org/dol/pdf/10.1287/mnsc.21.11.1338			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1243		Jack Z. Sissors and Roger B. Baron, Advertising Media Planning, McGraw-Hill: New York, 7th edition, 2010			Larry Chilagouris	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1244	8/11/2022	Javier Olivan Meta Platforms Form 3			Javier Olivan	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402).
1245	2023-2025	Javier Olivan Meta Platforms Form 3 Form 4s 2023-2025			Javier Olivan	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; F; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1246		Kalton, Graham (1986), "The treatment of missing survey data". Survey Methodology. 12:1-16, available at https://www150.statcan.gc.ca/n1/en/pub/12-001-x/1986001/article/14404-eng.pdf?st=LSBGCO4			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1247		Kalton, Graham; Kasprzyk, Daniel (1982). "Imputing for missing survey responses". Proceedings of the Section on Survey Research Methods. American Statistical Association, available at: https://www.istat.it/en/files/2014/05/1982-004-ASA.pdf			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1248		Kannan, P.K. and Hongshuang, L. (2017) "Digital marketing: A framework, review and research agenda" International Journal of Research in Marketing, Vol. 34: 22-45			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1249		Kendall's Advanced Theory of Statistics, Wiley, London, 1998, 6th Edition, Volume 1, by Alan Stuart & Keith Ord (Monte Carlo method)			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1250		Kenneth E. Clow and Donald Baack, Integrated Advertising, Promotion, and Marketing Communications, 7th edition, Pearson: New York, 2016, page 196.			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1251		Lenk, Peter J., Wayne S. DeSarbo, Paul E. Green, Martin R. Young (1996) "Hierarchical Bayes Conjoint Analysis: Recovery of Partworth Heterogeneity from Reduced Experimental Designs," Marketing Science, 15(2), 173-191.			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1252		Marsaglia, G. (2006). "Ratios of Normal Variables. Journal of Statistical Software. 16(4), 1 - 10. doi:10.18637. Available at: https://www.jstatsoft.org/article/view/v016i04			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1253		Marshall, Pablo and Eric T. Bradlow (2002) "A Unified Approach to Conjoint Analysis Models," Journal of the American Statistical Association			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1254		Masih, R. (1999) "An Empirical Analysis of the Demand for Commercial Television Advertising" Applied Economics, Vol. 31: 149-163			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1255		Media Planning: Professional Exam Study Guide sourced at https://www.facebook.com/business/learn/certification/study-guide-planning			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1256		Meta Business Help Center, "Cost per click (all)", https://www.facebook.com/business/help/560163334110364?helpref=faq_content			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					F	Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1257		Meta Transparency Center, "How many fake accounts did we take action on?" Apr-Jun 2018			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1258		Meta Transparency Center, "How many fake accounts did we take action on?" Apr-Jun 2019			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1259		Meta Transparency Center, "How many fake accounts did we take action on?" Apr-Jun 2020			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1260		Meta Transparency Center, "How many fake accounts did we take action on?" Apr-Jun 2021			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1261		Meta Transparency Center, "How many fake accounts did we take action on?" Jan-Mar 2018			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1262		Meta Transparency Center, "How many fake accounts did we take action on?" Jan-Mar 2019			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1263		Meta Transparency Center, "How many fake accounts did we take action on?" Jan-Mar 2020			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1264		Meta Transparency Center, "How many fake accounts did we take action on?" Jan-Mar 2021			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1265		Meta Transparency Center, "How many fake accounts did we take action on?" Jul-Sept 2018			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1266		Meta Transparency Center, "How many fake accounts did we take action on?" Jul-Sept 2019			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1267		Meta Transparency Center, "How many fake accounts did we take action on?" Jul-Sept 2020			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1268		Meta Transparency Center, "How many fake accounts did we take action on?" Jul-Sept 2021			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1269		Meta Transparency Center, "How many fake accounts did we take action on?" Oct-Dec 2017			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1270		Meta Transparency Center, "How many fake accounts did we take action on?" Oct-Dec 2018			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1271		Meta Transparency Center, "How many fake accounts did we take action on?" Oct-Dec 2019			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1272		Meta Transparency Center, "How many fake accounts did we take action on?" Oct-Dec 2020			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1273		Meta Transparency Center, "How many fake accounts did we take action on?" Oct-Dec 2021			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F; D	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Sufficient information was provided to locate document; Plaintiff provided Meta with additional information; This is Meta's own website. Admissible under FRE 703 and 705.
1274		Meta's 2015-2020 10-Q filings with the U.S. Securities and Exchange Commission			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1275	12/31/2012	Meta's Form 10-K for 2012			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1276	12/31/2013	Meta's Form 10-K for 2013			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1277	12/31/2014	Meta's Form 10-K for 2014			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures			H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1278	12/31/2015	Meta's Form 10-K for 2015			Charles Cowan Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1279	12/31/2016	Meta's Form 10-K for 2016			Charles Cowan Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1280	12/31/2017	Meta's Form 10-K for 2017			Charles Cowan Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1281	12/31/2019	Meta's Form 10-K for 2019			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation; Relevant to Disclosures			H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1282	12/31/2021	Meta's Form 10-K for 2021			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1283		"About Potential Reach," Facebook for Business, https://www.facebook.com/business/help/1665333080167380 (viewed Jan. 28, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1284	6/30/2025	Meta's Q2 2025 Balance Sheet			Alex Schultz Javier Olivan Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
1285		Meta's Responses and Objections to all of Plaintiff's Interrogatories				Will be used to prove Meta's liability, classwide impact, and damages					LC	Exhibit is not inadmissible based on the presence of legal conclusions, if any.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1286		Meta's Responses and Objections to all of Plaintiff's Requests for Admission				Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
1287		Neil Newman, Kevin Leyton-Brown, Paul Milgrom, and Ilya Segal, "Incentive Auction Design Alternatives: A Simulation Study," Proceedings of the ACM Conference on Economics and Computation, pages 603-604, 2020.			Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1288		"About Reach and Frequency Buying," Facebook for Business, December 2, 2019, available at: https://www.facebook.com/business/help/251123081984768?id=842420845959022 (accessed on February 25, 2021)					Catherine Tucker	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1289		"About Reaching New Audiences," Facebook for Business, https://www.facebook.com/business/help/717368264947302 (viewed Feb. 24, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1290		"About Scheduling Ads," Facebook for Business, https://www.facebook.com/business/help/1037425549606837 (viewed Jan. 28, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1291		"About the Brand Awareness Objective," Facebook for Business, July 15, 2020, available at: https://www.facebook.com/business/help/1629235777115312?id=429023050853196 (accessed on February 13, 2021).					Catherine Tucker	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1292		"About the Reach Objective," Facebook for Business, January 9, 2019, available at: https://www.facebook.com/business/help/218841515201583 (accessed on February 13, 2021).					Catherine Tucker	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1293		"About the Structure of Facebook Ads," Facebook for Business, https://www.facebook.com/business/help/706063442820839 (viewed Feb. 24, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1294		Nisan, N., Roughgarden, T., Tardos, E., and Vazirani, V. (Eds.). (2007). Algorithmic Game Theory. Cambridge: Cambridge University Press.			Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H, PREJ, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1295		"About Your CPM Under Reach and Frequency," Facebook for Business, December 2, 2019, https://www.facebook.com/business/help/1324346470993674 (viewed Jan. 28, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1296		"Ad Targeting," Facebook for Business, https://www.facebook.com/business/ads/ad-targeting (viewed Jan. 28, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1297		"Advertising Attributes to Avoid to Improve Ad Quality and Performance," Facebook for Business, https://www.facebook.com/business/help/1767120243598011 (viewed Jan. 28, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1298		"AirBnB," Facebook for Business, available at: https://www.facebook.com/business/success/2-airbnb (accessed on February 25, 2021)					Catherine Tucker	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1299		Orme, B. (2000), "Hierarchical Bayes: Why All the Attention?", http://www.sawtoothsoftware.com/support/technical-papers/hierarchical-bayes-estimation/hierarchical-bayes-why-all-the-attention-2000			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H, F, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1300		Orme, B. (2013), "Which Conjoint Method Should I Use?", http://www.sawtoothsoftware.com/products/conjoint-choice-analysis/99-support/technical-papers/1042-which-conjoint-method-should-i-use			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1301		"Amazing Selling Machine," Amazing.com, available at: https://www.amazingsellingmachine.com/ (accessed on February 5, 2021);					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1302		"Best Practices: Ad Bidding and Budgeting," Facebook for Business, https://www.facebook.com/business/a/ad-bidding (viewed Feb. 18, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1303		"Buying Ads: Buy Facebook Ads On Any Budget," Facebook for Business, https://www.facebook.com/business/ads/pricing (viewed Feb. 26, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1304		"Choose the Right Buying Type for Your Brand Campaign," Facebook for Business, https://www.facebook.com/business/help/654484604719506 (viewed Feb. 18, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1305		"Choose the Right Frequency Cap for Your Reach and Frequency Campaign," Facebook for Business, https://www.facebook.com/business/help/1461336133922536 (viewed Feb. 18, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1306		Orme, B. 2010, "A Short History of Conjoint Analysis", http://www.sawtoothsoftware.com/support/technical-papers/general-conjoint-analysis/a-short-history-of-conjoint-analysis-2009			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages				Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).	H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1307		"Community Standards Enforcement Report," Facebook, https://transparency.facebook.com/communitystandardsenforcement#fake-accounts (viewed Feb. 24, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1308		"Custom Audiences Is Now Available to Every Advertiser," Facebook for Business, October 23, 2013, available at: https://www.facebook.com/business/news/CustomAudiences-Is-Now-Available-to-Every-Advertiser (accessed on February 19, 2021).					Catherine Tucker	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1309		Orme, Bryan K. "Getting Started With Conjoint Analysis: Strategies for Product Design and Pricing Research." (2006).			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					D, H, F	Sufficient information was provided to locate document. Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1310		"Eliminate Your UA Gaps With Bespoke Services From Bidalgo," Bidalgo, available at: https://www.bidalgo.com/services/#fully-managed-service (accessed on February 15, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1311		"Estimation," Britannica, https://www.britannica.com/science/estimation					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1312		"Facebook Ads Automation and Reporting," AdStage, 2020, available at: https://www.adstage.io/products/integrations/facebook-ads/ (accessed on November 29, 2020).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1313		"Facebook and Location," Facebook Help Center, https://www.facebook.com/help/337244676357509 (viewed Feb. 10, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1314		"Facebook Bug Bounty," Facebook, March 23, 2018, available at: https://www.facebook.com/BugBounty/posts/2001267099887506 (accessed on February 24, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1315		"Facebook Description of Methodology," Facebook for Business, https://www.facebook.com/business/help/785455638255832 (viewed Feb. 9, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1316		"Facebook Measurement," Facebook for Business, available at: https://www.facebook.com/business/measurement/ (accessed on February 24, 2021)					Catherine Tucker	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1317		Orme, Bryan K. Getting started with conjoint analysis: strategies for product design and pricing research. 4th ed. Research Publishers LLC, Manhattan Beach, CA (2020)			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					D, H, F	Sufficient information was provided to locate document. Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1318		"Get Results From Your Campaigns, Ad Sets and Ads," Facebook for Business, available at: https://www.facebook.com/business/learn/lessons/basics-of-editing-campaign-ad-sets-andmore?course_id=2097363980380415&curriculum_id=726377631115881 (accessed on February 24, 2021)					Catherine Tucker	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1319		"Help: Choose the Right Ad Objective," Facebook for Business, available at: https://www.facebook.com/business/help/1438417719786914 (viewed Feb. 24, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1320		"How Ad Billing Works on Facebook," Facebook for Business, January 6, 2021, available at: https://www.facebook.com/business/help/716180208457684?id=1792465934137726 (accessed on February 28, 2021).					Catherine Tucker	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1321		"How does TRP buying on Facebook work?," Facebook for Business, March 17, 2017, available at: https://www.facebook.com/business/help/518993728299293?id=842420845959022 (accessed on February 27, 2021).					Catherine Tucker	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1322		"How Much It Costs to Advertise on Facebook," Facebook for Business, November 24, 2020, available at: https://www.facebook.com/business/help/201826586525529?id=629338044106215 (accessed on February 13, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1323		"How to Target Facebook Ads to Your Audience," AdStage, December 15, 2016, available at: https://blog.adstage.io/2013/08/23/how-to-target-facebook-ads-to-your-audience (accessed on February 17, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1324		"Kenshoo Expert Services," Kenshoo, available at: https://kenshoo.com/expertservices/ (accessed on February 15, 2021);					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1325		Otto Kleppner, Advertising Procedure, 5th edition, 1966, Prentice Hall: New Jersey, 590.			Larry Chiagouris	Will be used to prove Meta's liability, classwide impact, and damages				Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	D, H, F	Sufficient information was provided to locate document. Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1326		"Measuring Audiences to Printed Publications," Audience Dialogue, available at: http://www.audience dialogue.net/meas-print.html (accessed on February 19, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1327		"Metrics FYI: Estimated Reach, Streaming Reactions and Graph API," Facebook Newsroom, https://about.fb.com/news/2016/12/metrics-fyi-estimated-reach-streaming-reactions-and-graph-api/ (viewed Feb. 23, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1328		"Objectives, Ad Formats and Placements Available with Reach and Frequency Buying," Facebook for Business, February 11, 2021, available at: https://www.facebook.com/business/help/681925088666087?id=842420845959022 (accessed on February 13, 2021).					Catherine Tucker	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1329		"Parachute," Facebook for Business, available at: https://www.facebook.com/business/success/parachute (accessed on January 30, 2021).					Catherine Tucker	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1330		"R2," IBM, available at https://www.ibm.com/support/knowledgecenter/SSEP7J_11.1.0/com.ibm.swg.ba.cognos.ug_c_a_dshb.doc/r_squared.html (viewed February 25, 2021);					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1331		"Reach today's hard-to-reach audiences," Facebook for Business, available at: https://www.facebook.com/business/m/reservefb (accessed on February 27, 2021).					Catherine Tucker	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1332		"Results," Facebook for Business, https://www.facebook.com/business/help/611432918970668?helpref=faq_content (viewed Jan. 28, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1333		<u>"Sales Reports," Shopify Help Center, available at: https://help.shopify.com/en/manual/reports-and-analytics/shopify-reports/report-types/sales-report#sales-by-trafficreferrer (accessed on January 30, 2021).</u>					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1334		"Sampling Estimation & Survey Inference," United States Census Bureau, https://www.census.gov/topics/research/statsearch/expertise/survey-sampling.html (viewed Feb. 9, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1335		"Sampling," U.S. Bureau of Labor Statistics, https://www.bls.gov/opub/hom/topic/sampling.htm (viewed Feb. 27, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1336		"Set Up a Reach and Frequency Campaign," Facebook for Business, https://www.facebook.com/business/help/885674161555708 (viewed Feb. 18, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1337		"Top 5 Reasons Your Facebook Ad Has Limited Reach," AdStage, October 8, 2013, available at: https://blog.adstage.io/2013/10/08/top-5-reasons-your-facebook-ad-has-limited-reach (accessed on February 14, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1338		"Unique Metrics," Facebook for Business, https://business.facebook.com/business/help/283579896000936 (viewed Feb. 9, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1339		"Updates to Potential Reach," Facebook for Business, Mar. 2019, https://www.facebook.com/business/help/567031670465069 (viewed Jan. 28, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1340		"Use Location Targeting," Facebook for Business, https://www.facebook.com/business/help/365561350785642 (viewed Feb. 10, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1341		"View Results On Your Facebook Ad in Ads Manager," Facebook for Business, "About Breakdowns, Metrics and Filtering in Ads Reporting," Facebook for Business, December 17, 2020, available at: https://www.facebook.com/business/help/264160060861852 (accessed on February 28, 2021).					Catherine Tucker	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1342		"View Results on Your Facebook Ad in Ads Manager," Facebook for Business, https://www.facebook.com/business/help/318580098318734 (viewed Mar. 3, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1343		"Welcome to the Facebook Marketing Partners Program," Facebook for Business, February 17, 2015, available at: https://www.facebook.com/business/marketing/partners/partner-news/welcome-to-thefacebook-marketing-partnerprogram (accessed on February 19, 2021).					Catherine Tucker	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1344		"Welcome To Your Ad Campaign Command Center," Facebook for Business, https://www.facebook.com/business/tools/ads-manager (viewed Feb. 25, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1345		"What is Amazing Selling Machine?," Amazing.com , available at: https://www.amazingsellingmachine.com/about?_ga=2.119066240.824253951.1607864974.20210219.1607864974 (accessed on February 19, 2021)					Catherine Tucker	Expert Foundation	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to expert foundation (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1346		"When to Use Reach and Frequency Buying," Facebook for Business, https://www.facebook.com/business/help/525949344256092 (viewed Feb. 18, 2021).					Catherine Tucker; Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1347		"Your Guide to Facebook Bid Strategies," Facebook for Business, https://www.facebook.com/business/m/oneshoppers/facebook-bid-strategy-guide (viewed Feb. 24, 2021).					Steven Tadelis	Expert Foundation; Relevant to Disclosures; Explain Meta's Ad Auction; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1348	3/1/2018	Aaron Smith and Monica Anderson, "Social Media Use in 2018: Demographics and Statistics." Pew Research Center, March 1, 2018. Available at: https://www.pewresearch.org/Internet/2018/03/01/social-media-use-in-2018/ .			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages	Steven Tadelis	Expert Foundation			H; REL; PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1349		Package "bayesm" guide available at http://cran.r-project.org/web/packages/bayesm/bayesm.pdf (Updated October 25, 2019)			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H, REL, PREJ	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1350		Paul W. Farris, Neil T. Bendle, Phillip E. Pfeifer and David J. Reibstein, Marketing Metrics: The Definitive Guide to Measuring Marketing Performance, 2nd edition, 2010, Pearson: New York, page 301.			Larry Chlaigouris	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1351		Phillips, Sara (2007) "A brief history of Facebook" The Guardian 25 July 2007 [https://www.theguardian.com/technology/2007/jul/25/media.newmedia] accessed 8 August 2020.			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H, F, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1352		Pinnell, J. & Olsen, P. (1996), "Using a Choice-Based Conjoint to Assess Brand Strength and Price Sensitivity", http://www.sawtoothsoftware.com/support/technical-papers/cbc-related-papers/using-choice-based-conjoint-to-assess-brand-strength-and-price-sensitivity-1996			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1353		Adjusted R squared," IBM, available at https://www.ibm.com/support/knowledgecenter/SSEP7J_11.1.0/com.ibm.swg.ba.cognos.ug_ca_dshb.doc/rquared_adjusted.html (viewed February 25, 2021)					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1354		Rosa, Anthony De. "Facebook Brings New Ad Opportunities to Brands." Reuters. Thomson Reuters, February 29, 2012.			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1355		Rossi, Peter E., Greg M. Allenby and Robert McCulloch (2005) Bayesian Statistics and Marketing, John Wiley & Sons.			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1356		Roughgarden, T., Talgam-Cohen, I., and Yan, Q. "Robust Auctions for Revenue via Enhanced Competition," Operations Research, 68(4):1074-1094, June 2020.			Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1357		Roughgarden, T., Twenty Lectures on Algorithmic Game Theory, Cambridge University Press, 2016.			Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document. Admissible under FRE 703 and 705.
1358		Roughgarden, Tim. Algorithmic Game Theory. Communications of the ACM, July 2010, Vol. 53 No. 7, Pages 78-86. https://cacm.acm.org/magazines/2010/7/95063-algorithmic-game-theory/fulltext			Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). Admissible under FRE 703 and 705.
1359	5/17/2012	Sheryl Sandberg Facebook Inc Form 3			Sheryl Sandberg	Will be used to prove Meta's liability, classwide impact, and damages					H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1360	2012-2024	Sheryl Sandberg Meta Platforms Inc & Facebook Inc Form 4s 2012-2024			Sheryl Sandberg	Will be used to prove Meta's liability, classwide impact, and damages					H, REL; F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
1361		Silk, A.J., Klein, L.R. and Berndt, E.R. (2002) "Intermedia Substitutability and Market Demand by National Advertisers" Review of Industrial Organization, Vol. 20(4): 323-348			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H, F, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
1362		Software for Hierarchical Bayes Estimation for CBC Data manual available at https://sawtoothsoftware.com/resources/manuals (Updated April 21, 2016)			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H, F, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
1363		Susan Athey and Denis Nekipelov, "A Structural Model of Sponsored Search Advertising Auctions," 2011.			Timothy Roughgarden	Will be used to prove Meta's liability, classwide impact, and damages					H, F	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
1364		T. Pham-Gia, N. Turkkan & E. Marchand (2006). "Density of the Ratio of Two Normal Random Variables and Applications." Communications in Statistics - Theory and Methods, 35:9, 1569-1591, DOI: 10.1080/03610920600683689, available at: https://www.researchgate.net/publication/233479623			Charles Cowan	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document.
1365		Tesler, L.G.(1964) "Advertising and Competition" Journal of Political Economy, Vol. 72(6): 537-562			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document.
1366		The CBC System for Choice-Based Conjoint Analysis, Version 8, http://www.sawtoothsoftware.com/support/technical-papers/cbc-related-papers/cbc-technical-paper-2013			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H, F, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
1367		Transcripts from Facebook Earnings Calls from Q2 2016 – Q2 2020			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H, F, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1368		Transcripts from Google Earnings Calls from Q2 2016 – Q4 2018			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H, F, R	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
1369		Tuten, Tracy L, and Michael R. Solomon. "Social Media Metrics." In Social Media Marketing, 3rd ed., 346. Los Angeles, California: Sage, 2018			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					D	Sufficient information was provided to locate document.
1370		Weise, M., Martínez-Cilment, C. and Bortella-Carrubi, D. (2020) "A framework for Facebook advertising effectiveness: a behavioral perspective" Journal of Business Research, Vol. 109: 76-87			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H, F, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
1371		Wikipedia Page "Exclusion of the null hypothesis" from 12/8/2020, https://web.archive.org/web/20201208093456/https://en.wikipedia.org/wiki/Null_hypothesis			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H, F, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
1372		Wikipedia Page "Purchase Funnel" from 12/10/2020, https://web.archive.org/web/20201210140440/https://en.wikipedia.org/wiki/Purchase_funnel			Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H, F, REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902). The exhibit is relevant (see FRE 401, 402).
1374		Arens, Elizabeth, "What is Potential Reach?," Sprout Social, January 16, 2019, available at: https://sproutsocial.com/insights/potential-reach/ (accessed on February 19, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1375	2/23/2022	Article titled "About Data Sampling" from the Meta Business Help Center, downloaded February 23, 2022					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1376		Article titled "About Lookalike Audiences" from Meta Business Help Center					Porter	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1377		Article titled "Ad Set" from Meta for Developers					Porter	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1378		Article titled "Ads Manager" from Meta for Business					Porter	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1379	10/11/2021	Article titled "An Update on How We Count People for Ads Planning and Measurement" from Meta for Business, dated October 11, 2021					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1380		Article titled "Unicorn: A System for Searching the Social Graph" from Meta Research					Porter	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1381	3/3/2022	Article titled "Unique Metrics" from the Meta Business Help Center, downloaded 03/03/2022					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Lack of Personal Knowledge; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1382	9/30/2021	Article titled "Update to Our Pre-Campaign Estimates" from Meta for Business, dated 9/30/2021					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Unclean Hands; Relevant to Disclosures	Hearsay; Lack of Personal Knowledge; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Relevant to unclean hands and Meta's disclosures (see FRE 401, 402).		
1383	4/21/2021	Article titled "Facebook Description of Methodology," from Facebook Business Help Center, accessible through https://www.facebook.com/business/help/785455638255832 , last updated April 21, 2021					Meta, Experts	Help Center/Ads Manager	Foundation; Hearsay	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1384	3/16/2021	Article titled "Unique Metrics," from the Facebook Business Help Center, accessible through https://www.facebook.com/business/help/283579896000936 , dated March 16, 2021					Meta, Experts	Help Center/Ads Manager	Foundation; Hearsay	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1385	6/3/2020	Article titled "Unique Metrics," from the Facebook Business Help Center, accessible through https://www.facebook.com/business/help/283579896000936 , dated June 3, 2020,					Meta, Experts	Help Center/Ads Manager	Foundation; Hearsay	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1386		<u>Badger, Emily, "The Most Important Population Statistic that Hardly Ever Gets Talked About," Bloomberg CityLab, May 30, 2013, https://www.bloomberg.com/news/articles/2013-05-30/the-most-important-population-statistic-that-hardly-ever-gets-talked-about (viewed Mar. 2, 2021).</u>					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1387		Bajari, Patrick, et al., 2019, "The Impact of Big Data on Firm Performance: An Empirical Investigation," AEA Papers and Proceedings, 109: 33-37					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1388		Bedi, Suneal, and David Reibstein, "Damaged Damages: Errors in Patent and False Advertising Litigation," Kelley School of Business Research Paper No. 19-40 (2019), available at http://dx.doi.org/10.2139/ssrn.3440817					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1389		Carson, Richard T., Jordan J. Louviere, Donald A. Anderson, Phipps Arable, David S. Bunch, David A. Hensher, Richard M. Johnson, Warren F. Kuhfeld, Dan Steinberg, Joffre Swait, Harry Timmermans, and James B. Wiley, "Experimental Analysis of Choice," Marketing Letters, Vol. 5, No. 4 (1994): 351-367, at p. 355					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1390		Christiansen, Aske, "The Ultimate Guide to Facebook Ads Interest Targeting Research (Advanced Methods Exposed)," AdEspresso, available at https://adespresso.com/blog/guide-facebook-ads-interest-targeting-research-easy-advancedmethods-exposed/ (viewed Feb. 18, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1391	7/12/2020	Colorado Secretary of State Registration record for OrangeLight Enterprises, formation date, August 7, 2019, print date July 12, 2020					Ziernicki, Experts	Relevant to Plaintiff's Behavior; Relevant to Unclean Hands; Relevant to Lack of Reliance, Relevant to Damages	Hearsay; Prejudicial, Confusing; Relevancy; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1392		Converse, Jean M., and Stanley Presser, Survey Questions: Handcrafting the Standardized Questionnaire, Beverly Hills, CA: Sage Publications (1986), at p. 55					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1393		Dalessandro, Brian, Rod Hook, Claudia Pertlich, and Foster Provost, "Evaluating and Optimizing Online Advertising: Forget the Click, but There Are Good Proxies," Big Data, Vol. 3, No. 2 (2015): pp. 90-102.					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1394		Diez, David M., Christopher D. Barr, and Mine Çetinkaya-Rundel, OpenIntro Statistics, 3rd ed. (2015).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1395		Dillman, Don A., Mail and Telephone Surveys: The Total Design Method, United States: John Wiley & Sons, Inc. (1978),					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1396		Document titled "Updated Reibstein Exhibit 34, Facebook Ad Data Summary Statistics Ad Objectives, August 14, 2014-May 16, 2019					Reibstein	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1397		Document titled "Updated Tadelis Exhibit 17, Summary of Objectives All Adds Detail Data, August 15, 2014-May 16, 2019					Tadelis	Relevant to Disclosures; Relevant to Good Faith; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1398		<u>Facebook Ads: How to Estimate Your Investment Budget on Facebook?," My Little Big Web, November 25, 2020, available at: https://mylittlebigweb.com/en/facebook-ads-how-to-estimate-your-investment-budget-on-facebook/ (accessed on February 19, 2021).</u>					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1399	4/23/2021	Facebook's Transparency Portal as of April 23, 2021					Meta, Experts	Help Center/Ads Manager	Foundation; Hearsay	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1400		Figure 4, Expert Report of Professor Adam Porter					Porter	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1401		Fraser, Lynsey, "How to Reduce Facebook Ad Costs with Manual Bidding," Social Media Examiner, September 25, 2019, https://www.socialmediaexaminer.com/how-to-reduce-facebook-ad-costs-with-manual-bidding/ (viewed Jan. 28, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1402		<u>Gesenhues, Amy, "Direct-To-Consumer Advertisers Are Shifting Ad Dollars Away From Facebook," Marketing Land, June 11, 2018, available at: https://marketingland.com/direct-to-consumer-advertisers-are-shifting-addollars-away-from-facebook-241986/ (accessed on February 18, 2021)</u>					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1403		Goldberg, Sam, "Attribution: What It Is And Why It's Important," Search Engine Land, December 28, 2009, available at: https://searchengineland.com/attribution-what-it-is-and-why-its-important-32062 (accessed on February 28, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1404		Gordon, Brett E., Florian Zettelmeyer, Neha Bhargava, and Dan Chapsky, "A Comparison of Approaches to Advertising Measurement: Evidence from Big Field Experiments at Facebook," September 23, 2018, available at: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3033144 (accessed on March 1, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1405		Gray, Terry, "Variations On The 'But We Don't Know Which Half' Line," available at: https://staff.washington.edu/gray/misc/whichhalf.html (accessed on February 19, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1406		Green, Paul E., Abba M. Krieger, and Yoram Wind, "Thirty Years of Conjoint Analysis: Reflections and Prospects," Interfaces, Vol. 31, No. 3, supplement (2001): S56-S73, at p. S56					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1407		Guerrero, Louis, "Kenshoo Social's New Insights Panel Helps You Start Your Day Off Right," Kenshoo, March 13, 2020, available at: https://kenshoo.com/blog/kenshoo-insights-panel/ (accessed on November 29, 2020).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1408		Heath, Ben, "Facebook Buying Types - Auction vs. Reach and Frequency," LeadGuru, June 17, 2020, https://www.leadguru.co.uk/facebook-buying-types/ (viewed Feb. 18, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1409		Ho, Cecile, "Announcing Facebook Pixel," Facebook for Developers, October 14, 2015, available at: https://developers.facebook.com/ads/blog/posts/2015/10/14/announcing-facebook-pixel/ (accessed on February 18, 2021).					Catherine Tucker	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1410		https://adespresso.com/guides/facebook-ads-optimization/delivery-placements/ (accessed on February 13, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1411		Huber, Joel, "What We Have Learned from 20 Years of Conjoint Research: When to Use Self-Explicated, Graded Pairs, Full Profiles or Choice Experiments," Sawtooth Software Research Paper Series (1997): 1-15, at p. 2.					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1413		Iacobucci, Dawn, and Gilbert A. Churchill, Marketing Research: Methodological Foundations, Tenth Edition, South-Western Cengage Learning (2010), at p. 107.					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1414		Johnson, F. Reed, Jui-Chen Yang, and Shelby D. Reed, "The Internal Validity of Discrete Choice Experiment Data: A Testing Tool for Quantitative Assessments," Value in Health, Vol. 22, No. 2 (2019): 157-160,					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1415		Lee, Kevan, "The Complete, Always-Updated Guide to Facebook Advertising," Buffer Marketing, https://buffer.com/library/facebook-ads-guide/ (viewed Jan. 28, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1416		Lu, Christine, "Advanced Matching in Pixel," Facebook for Developers, July 20, 2018, available at: https://developers.facebook.com/ads/blog/posts/2018/07/20/advanced-matching-pixel/ (accessed on February 18, 2021).					Catherine Tucker	Expert Foundation; Explain Meta's Estimates, Metrics, and Models; Explain Meta's Ad Auction	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1417		Main, Kelly, "Everything You Need to Know About TV Advertising Costs," Fit Small Business, January 21, 2021, available at: https://fitsmallbusiness.com/tvadvertising/ (accessed on February 19, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1418		Manskar, Noah, "Interactive Map Shows How Crowds Move Through NYC During Workday," Patch, Feb. 18, 2019, https://patch.com/new-york/new-york-city/interactive-map-shows-how-crowds-move-through-nyc-during-workday (viewed Mar. 2, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1419		Manual for Complex Litigation, Fourth Edition, Federal Judicial Center (2004)					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1420		Marvin, Ginny, "Facebook to release first-party cookie option for ads, pull web analytics from Safari," MarketingLand, October 5, 2018, https://marketingland.com/facebook-to-release-first-party-pixel-for-ads-web-analytics-from-browsers-like-safari-249478 (accessed on February 18, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1421		McCarthy, J. Thomas, McCarthy on Trademarks and Unfair Competition, Fourth Edition, Thomson Reuters (2016) at p. 32-385					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1422		McClain, Colleen, "Most Americans Don't Answer Cellphone Calls from Unknown Numbers," Pew Research Center, December 14, 2020, https://www.pewresearch.org/fact-tank/2020/12/14/most-americans-dont-answer-cellphone-calls-from-unknown-numbers/ (viewed Feb. 26, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1423		McKenzie, Brian, et al., "Commuter-Adjusted Population Estimates: ACS 2006-10," U.S. Census Bureau, https://www.census.gov/content/dam/Census/library/working-papers/2013/acs/2013_McKenzie_02.pdf (viewed Mar. 2, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1424		Milgrom, Paul, Putting Auction Theory to Work, Cambridge University Press (2004).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1425		Miller, Stephanie, "Digital Marketing Attribution," DM News, February 6, 2013, available at: https://www.dmnews.com/data/article/13037548/digital-marketing-attribution (accessed on February 28, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1426		Minnium, Peter, "Advertising Engagement: Past, Present and Future," Marketing Land, October 1, 2014, https://marketingland.com/advertising-engagement-past-present-future-101087 (accessed on February 18, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1427		Newberry, Christina, "How to Advertise on Facebook in 2020: The Definitive Facebook Ads Guide," Hootsuite, October 2, 2019, available at: https://blog.hootsuite.com/how-to-advertise-on-facebook/ (accessed on February 8, 2021)					Catherine Tucker; Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1428		Newberry, Christina, "The Facebook Pixel: What It Is and How to Use It," Hootsuite, January 14, 2019, available at: blog.hootsuite.com/facebook-pixel/ (accessed on February 19, 2021)					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1429		O'Brien, Brad, "9 new and semi-secret Facebook targeting options," Marketing Land, July 21, 2016, https://marketingland.com/9-new-semi-secret-facebook-targeting-options-184810 (accessed on February 18, 2021).					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1430		Orme, Bryan K., "Chapter 10. Market Simulator for Conjoint Analysis," In Getting Started with Conjoint Analysis: Strategies for Product Design and Pricing Research, Third Edition, Madison, Wis.: Research Publishers LLC. (2014)					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1431		Payne, Stanley L., The Art of Asking Questions, Princeton: Princeton University Press (1951), at p. xi; Schaeffer, Nora Cate, and Stanley Presser, "The Science of Asking Questions," Annual Review in Sociology, Vol. 29 (2003): 65-88,					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1432		Perloff, Jeffery M., Microeconomics with Calculus, Third Edition (2014),					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1433		Plankov, Nikita, and Catherine Tucker, "Using The Purchase Funnel To Analyze Consumer Behavior," Law360, March 1, 2018, available at https://www.law360.com/articles/1017230/using-the-purchase-funnel-to-analyze-consumer-behavior (viewed February 15, 2021).					David Reibstein	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1434		Snap, Inc. SEC Form 10-K for the fiscal year ended Dec. 31, 2020.					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1435		Tadelis, Steven, Game Theory: An Introduction, Princeton University Press (2012).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1436		Treece, Klah, "Facebook Advertising: The Ultimate Guide with Examples," Fit Small Business, May 10, 2019, https://fitsmallbusiness.com/facebook-advertising/ (viewed Oct. 21, 2020).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1437		Tucker, Catherine E., "Social Networks, Personalized Advertising, and Privacy Controls," Journal of Marketing Research, Vol. 51, No. 5 (2014): pp. 546-562.					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1438		Tucker, Catherine E., "The Implications of Improved Attribution and Measurability for Antitrust and Privacy in Online Advertising Markets," George Mason Law Review, Vol. 20, No. 4 (2013): pp. 1025-1054.					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1439		Vahl, Andrea, "How to Create Epic Facebook Ads," Hubspot, https://offers.hubspot.com/epic-facebook-ads-facebook-in (viewed Feb. 2, 2021).					Steven Tadelis	Expert Foundation	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1440	4/8/2021	Webpage about "Potential Reach" from Business Help Center, last updated April 8, 2021					Meta, Experts	Help Center/Ads Manager	Foundation; Hearsay	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1441		Winer, Russell S., "Experimentation in the 21st Century: The Importance of External Validity," Journal of the Academy of Marketing Science, Vol. 27, No. 3 (1999): 349-358, at p. 350					David Reibstein	Expert Foundation	Hearsay; Foundation	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807).		
1442	8/21/2025	Supplemental Expert Report of Dr. Armando Levy			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					H, REL, PREJ, MIL	

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1443		Table of Allenby's results			David Reibstein Greg Allenby	Will be used to prove Meta's liability, classwide impact, and damages					H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1444		Facebook, Inc. SEC Form 10-Q for the quarterly period ended September 30, 2020.					Catherine Tucker	Expert Foundation; Relevant to Disclosures	Hearsay; Foundation	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).		
1445		AdStage Paid Media Benchmark Report for Q1 2018			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages				Relevant to Plaintiff's behavior, witness credibility, lack of reliance, unclean hands, and damages (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403). Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902).	H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1446		AdStage Paid Media Benchmark Report for Q3 2018			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1447		AdStage Paid Media Benchmark Report for Q4 2019			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1448		"AdStage Paid Media Q4 2018 Benchmark Report," AdStage, available at: https://www.adstage.io/resources/q4-2018-ppc-benchmark-report/ (accessed on February 18, 2021),					Catherine Tucker	Expert Foundation	Hearsay; Foundation	Relevant to Plaintiff's behavior, witness credibility, lack of reliance, unclean hands, and damages (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1449		Hannah Kuchler, How Facebook became to big to handle, Financial Times (Mar. 28, 2019) https://www.ft.com/content/be723754-501c-11e9-9c76-bf4a0ce37d49			Alex Schultz	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1450		IAB Internet Advertisinf Revenue Report Full Year Results for 2013			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1451		IAB Internet Advertisinf Revenue Report Full Year Results for 2014			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1452		IAB Internet Advertisinf Revenue Report Full Year Results for 2015			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1453		IAB Internet Advertisinf Revenue Report Full Year Results for 2016			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1454		IAB Internet Advertisinf Revenue Report Full Year Results for 2017			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1455		IAB Internet Advertisinf Revenue Report Full Year Results for 2018			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1456		IAB Internet Advertisinf Revenue Report Full Year Results for 2012			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages	Catherine Tucker	Expert Foundation			H; F; REL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). MIL is opposed. Balance favors admissibility (see FRE 401, 403). The exhibit is relevant (see FRE 401, 402). Admissible under FRE 703 and 705.
1470	6/25/2018	Email chain "RE: Age and SUMA Validation for Targeting Use"	FB-SINGER-00039440	FB-SINGER-00039441							REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
1471	1/22/2018	Email chain "RE: Following-up on audience estimates as they relate to DA growth"	FB-SINGER-00086164	FB-SINGER-00086165							REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
1472	1/9/2017	[tasks] #15401523: Run a small experiment to measure the elasticity of LWI creates against outcome prediction magnitud	FB-SINGER-00113664	FB-SINGER-00113665							REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1473	1/14/2019	Message from Rhaul Bhandari to David Amsallem	FB-SINGER-00031343		David Amsallem, Rhaul Bhandari						REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
1474	9/24/2018	Max Feasible Reach_ Outcome Prediction	FB-SINGER-00089865	FB-SINGER-00089871	Yaron Fidler						REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
1475	9/15/2018	Max Lifetime Reach with Outcome Prediction Discussion	FB-SINGER-00091041	FB-SINGER-00091050	Yaron Fidler						REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
1476	3/6/2019	Email from Facebook Ads Team to Miles Dobbyn re: Your ad is approved	TP_00000011	TP-00000011			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1477	3/7/2019	Email from Facebook Ads Team to Miles Dobbyn re: Your First Facebook Ads Receipt	TP_00000014	TP-00000015			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1478	3/8/2019	Email from Facebook Ads Team to Miles Dobbyn re: Your Facebook Ads Receipt	TP_00000031	TP-00000033			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1479	3/14/2019	Email from Facebook Ads Team to Miles Dobbyn re: Your Facebook Ads Receipt	TP_00000202	TP-00000109			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1480	4/3/2019	Email from Facebook Ads Team to Miles Dobbyn re: Your Facebook Ads Receipt	TP_00000697	TP-00000699			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1481	8/30/2020	Email from Facebook Ads Team to Miles Dobbyn re: Your Facebook Ads Receipt	TP_00001063	TP-00001064			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1482	10/14/2020	Email from Facebook Ads Team to Miles Dobbyn re: Your ad is scheduled or running	TP_00001079	TP_00001079			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1483	10/14/2020	Email from Facebook Ads Team to Miles Dobbyn re: Your Facebook Ads Receipt	TP_00001093	TP_00001095			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1484		Third Party Ads Manager Production Key					Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Hearsay;	"Insufficient description to identify document" is not a valid objection. Document provided for clarity.		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1485	9/6/2017	Vanity Fair article entitled, "Facebook Claims It's Reaching More Americans Than Exist in America"					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Reliance	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1486	9/7/2017	Guardian article entitled, "Facebook claims it can reach more young people that exist in UK, US and other countries"					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Reliance	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1487	9/6/2017	Wall Street Journal article entitled, "Facebook's Claimed Reach in the U.S. is Large than Census Figures, Analyst Finds"					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Reliance	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1488	9/6/2017	CNBC article entitled, "Facebook inflates its ad reach by millions, analyst claims"					Alex Schultz; Amy Dunn; Rob Goldman	Relevant to Reliance	Hearsay; Lack of Personal Knowledge; Prejudicial, Confusing	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility; to establish Meta's affirmative defenses and rebut all of Plaintiffs' claims (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1489	1/1/2019	Email from Facebook Business to Miles Dobbyn, re Miles, here are 3 ways Facebook helps business	TP_00000002	TP_00000002			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1490	7/12/2020	Beauty Deals Facebook Page					Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Hearsay, Relevancy	Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		
1491	10/19/2020	World Gift Deals Facebook Page	TP_00001236	TP_00001240			Daniel Ziernicki	Relevant to Plaintiff's Behavior; Relevant to Lack of Reliance; Relevant to Unclean Hands	Foundation; Hearsay; Prejudicial, Confusing; Relevancy	Foundation/personal knowledge will be established at trial (see FRE 201, 602, 901, 902). Not hearsay and/or hearsay exception applies (see FRE 801, 803, 804, 805, 807). Relevant to Plaintiff's Behavior; Lack of Reliance; Unclean Hands; witness credibility (see FRE 401, 402), which outweighs any potential confusion or prejudice (see FRE 401, 403).		

Trial Ex. No.	Date	Description	Begin Bates No.	End Bates No.	Plaintiffs' Sponsoring Witness	Plaintiffs Exhibit Purpose	Defendant's Sponsoring Witness	Defendant's Exhibit Purpose	Plaintiffs' Objections	Defendant's Response	Defendant's Objections	Plaintiffs' Response
1492	3/7/2018	Message summary [{"otherUserFbId":null,"threadFbId":2385687638124076}]	FB-SINGER-00039952	FB-SINGER-00039953	Yaron Fidler, David Amsellem, Rob Goldman, Alex Schultz, Amy Dunn						REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
1493	10/5/2018	Pillar Review - Potential reach	FB-SINGER-00189104	FB-SINGER-00189121	Catherine Tucker, Larry Chiagouris, Amy Dunn						F; REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
1494	2/7/2018	Post by Emily Atwater in Targeting Quality Working Group with comments	FB-SINGER-00181315	FB-SINGER-00181316	Amy Dunn, Larry Chiagouris						REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403).
1495		https://finance.yahoo.com/quote/META/			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					AUTH; H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). Authenticity will be established at trial (FRE 901, 902). MIL is opposed. Admissible under FRE 703 and 705.
1496		DZ Reserve Long-Form Notice, at 1. [https://facebookpotentialreachlawsuit.com/media/0jqbw2d/dzreserve-long-form-notice.pdf]			Armando Levy	Will be used to prove Meta's liability, classwide impact, and damages					AUTH; H; REL; PREJ; MIL	Not hearsay (FRE 801) and/or hearsay exception applies (FRE 803, 804, 807). The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). Authenticity will be established at trial (FRE 901, 902). MIL is opposed. Admissible under FRE 703 and 705.
1497	6/11/2019	Taking out reach estimation - Pre read	FB-SINGER-00024986	FB-SINGER-00024996	Amy Dunn						F; REL; PREJ	The exhibit is relevant (see FRE 401, 402). Balance favors admissibility (see FRE 401, 403). Authenticity and foundation, including personal knowledge if necessary, will be established at trial (FRE 602, 901, 902).
1502		Ads Manager Screen Shot					Amy Dunn, Rob Goldman, Alex Schultz	Relevant to Disclosures; Explain Meta's Estimates, Metrics, and Models				